



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
Date: ____ / ____ / ____
Page ____ of ____
Source Designation: _____

**COMPLIANCE PLAN/
SCHEDULE OF COMPLIANCE
FOR CAAPP PERMIT**

FOR AGENCY USE ONLY

ID NUMBER: _____

PERMIT #: _____

DATE: _____

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT THE APPLICANT SUBMIT A COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR ALL EMISSION UNITS AT THE CAAPP SOURCE, REGARDLESS OF THE COMPLIANCE STATUS OF EACH INDIVIDUAL EMISSION UNIT. THIS FORM REQUIRES THAT THE COMPLIANCE STATUS BE STATED FOR EACH EMISSION UNIT. APPLICATION FORM 294-CAAPP, "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE - ADDENDUM FOR NON COMPLYING EMISSION UNITS," MUST BE SUBMITTED FOR EACH EMISSION UNIT NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF SUBMITTAL.

SOURCE INFORMATION

1) SOURCE NAME:

Page1 Landfill

2) DATE FORM
PREPARED:

3) SOURCE ID NO.
(IF KNOWN):

201-801-AAF

SOURCE COMPLIANCE INFORMATION

4) DESCRIBE THE COMPLIANCE STATUS OF THE SOURCE WITH ALL APPLICABLE REQUIREMENTS (E.G., "SOURCE IS IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS"):

A Title V Compliance Monitoring & Response
Plan is to Be Finalized By June 1, 1999.

5) IF IN COMPLIANCE, WILL THE SOURCE CONTINUE TO COMPLY WITH ALL APPLICABLE REQUIREMENTS?

☒ YES ☐ NO

IF NO, EXPLAIN:

6) WILL THE SOURCE MEET, ON A TIMELY BASIS, APPLICABLE REQUIREMENTS WHICH BECOME EFFECTIVE DURING THE PERMIT TERM?

☒ YES ☐ NO

IF NO, EXPLAIN

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE _____

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FOR APPLICANT'S USE

7) EMISSION UNITS IN COMPLIANCE

DESIGNATION ID NUMBER

EMISSION UNIT

[illegible]

EMISSION UNITS COMPLIANCE INFORMATION (cntd)

[illegible]

8) EMISSION UNITS SUBJECT TO FUTURE COMPLIANCE DATES
THE FOLLOWING EMISSION UNITS, WHICH ARE CURRENTLY IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS, WILL ACHIEVE ON A TIMELY BASIS, AND MAINTAIN COMPLIANCE WITH, FUTURE COMPLIANCE DATES AS THEY BECOME APPLICABLE DURING THE PERMIT TERM. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-2:

[illegible]

9a) EMISSION UNITS NOT IN COMPLIANCE - COMPLIANCE TO BE ACHIEVED PRIOR TO PERMIT ISSUANCE
 THE FOLLOWING EMISSION UNITS ARE NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT APPLICATION. HOWEVER, THESE EMISSION UNITS WILL ACHIEVE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS PRIOR TO PERMIT ISSUANCE AND WILL CONTINUE TO COMPLY WITH SUCH REQUIREMENTS DURING THE PERMIT TERM. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-3:

DESIGNATION ID NUMBER	EMISSION UNIT	FUTURE COMPLIANCE DATE (MONTH/DAY/YEAR)

b) THE FOLLOWING IS A NARRATIVE DESCRIPTION OF THE MEANS BY WHICH COMPLIANCE WILL BE ACHIEVED FOR EACH OF THE EMISSION UNITS LISTED IN 9a) ABOVE. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-4:

10) EMISSION UNITS NOT IN COMPLIANCE - COMPLIANCE WILL NOT BE ACHIEVED PRIOR TO PERMIT ISSUANCE
 THE FOLLOWING EMISSION UNITS WILL NOT BE IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT ISSUANCE. A FORM 294-CAAPP, "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE - ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE SUBMITTED FOR EMISSION UNITS NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT ISSUANCE. A FORM 294-CAAPP IS SUBMITTED FOR THE FOLLOWING EMISSION UNITS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-5:

DESIGNATION ID NUMBER	EMISSION UNIT	DATE COMPLIANCE SCHEDULED TO BE ACHIEVED (MONTH/DAY/YEAR)



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DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
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SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
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Page ____ of ____
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**COMPLIANCE PLAN/
SCHEDULE OF COMPLIANCE -
ADDENDUM FOR NONCOMPLYING
EMISSION UNITS**

FOR AGENCY USE ONLY

ID NUMBER: _____

PERMIT #: _____

DATE: _____

THIS ADDENDUM SHALL BE COMPLETED FOR EACH EMISSION UNIT WHICH IS NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT ISSUANCE. IT SHALL RESEMBLE AND BE AT LEAST AS STRINGENT AS THAT CONTAINED IN ANY JUDICIAL CONSENT DECREE OR ADMINISTRATIVE ORDER TO WHICH THE SOURCE IS SUBJECT.

SOURCE INFORMATION

1) SOURCE NAME:

Pagel Landfill

2) DATE FORM
PREPARED: _____

3) SOURCE ID NO.
(IF KNOWN):

201-801-AAF & 201-808-ADB

4) CONSTRUCTION PERMIT NO. (IF APPLICABLE): _____

GENERAL INFORMATION

5) NAME AND FLOW DIAGRAM DESIGNATION OF THE NONCOMPLYING EMISSION UNIT: _____

6a) LISTING OF APPLICABLE REQUIREMENTS WITH WHICH THE EMISSION UNIT DOES NOT COMPLY:

APPLICABLE REQUIREMENT

APPLICABLE RULE

i)

ii)

iii)

b) EXPLANATION OF WHY THE EMISSION UNIT IS NOT IN COMPLIANCE: _____

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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FOR APPLICANT'S USE

7) PROVIDE THE REMEDIAL MEASURES WHICH WILL BE USED TO BRING THE EMISSION UNIT INTO COMPLIANCE:	
8) PROVIDE A SEQUENCE OF ACTIONS WITH DATES OF MILESTONES WHICH WILL LEAD TO COMPLIANCE OF THE EMISSION UNIT (PUT AN 'X' IN THE BOX OF EACH APPLICABLE EVENT):	
	ACTUAL OR ANTICIPATED DATE OF COMPLETION (MONTH/YEAR)
<input type="checkbox"/> a) PRELIMINARY EVALUATION OF REMEDIAL ACTIONS COMPLETED	____ / ____
<input type="checkbox"/> b) BINDING AGREEMENT ENTERED INTO TO ALTER EMISSION UNIT	____ / ____
<input type="checkbox"/> c) CONSTRUCTION PERMIT APPLIED FOR AIR POLLUTION CONTROL EQUIPMENT FOR THIS EMISSION UNIT OR TO REPLACE THIS EMISSION UNIT	____ / ____
<input type="checkbox"/> d) NEW EQUIPMENT DELIVERED TO THE SOURCE. IF PRESENT EQUIPMENT WAS ALTERED, STATE THE DATE SUCH ALTERATION BEGAN	____ / ____
<input type="checkbox"/> e) CONSTRUCTION OF NEW EQUIPMENT COMPLETED	____ / ____
<input type="checkbox"/> f) ALTERATION OF EXISTING EQUIPMENT COMPLETED	____ / ____
<input type="checkbox"/> g) EMISSION UNIT TESTED TO DEMONSTRATE COMPLIANCE WITH THE APPLICABLE REQUIREMENTS	____ / ____
<input type="checkbox"/> h) OTHER (DESCRIBE):	____ / ____
<input type="checkbox"/> i) OTHER (DESCRIBE):	____ / ____
<input type="checkbox"/> j) OTHER (DESCRIBE):	____ / ____
<input type="checkbox"/> k) EQUIPMENT FULLY OPERATIONAL AND IN COMPLETE COMPLIANCE	____ / ____

9) EXPLAIN THE INITIAL MEANS WHICH WILL BE USED TO DEMONSTRATE COMPLIANCE AFTER REMEDIAL ACTIONS HAVE BEEN COMPLETED:

10) SCHEDULE FOR SUBMISSION OF CERTIFIED PROGRESS REPORTS (FORM 295-CAAPP)

NOTE: CERTIFIED PROGRESS REPORTS MUST BE SUBMITTED NO LESS FREQUENTLY THAN EVERY 6 MONTHS.

☐ JUNE 30 AND DECEMBER 31 OF EACH YEAR

☐ OTHER, SPECIFY DATES:



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Revision #: _____
Date: ____ / ____ / ____
Page ____ of ____
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COMPLIANCE CERTIFICATION

FOR AGENCY USE ONLY

ID NUMBER: _____

PERMIT #: _____

DATE: _____

AN APPLICATION FOR A CAAPP PERMIT MUST CONTAIN A CERTIFICATION OF COMPLIANCE SIGNED BY A RESPONSIBLE OFFICIAL. THIS FORM MUST BE SUBMITTED WITH THE ORIGINAL CAAPP PERMIT APPLICATION AND UPDATED ON AN ANNUAL BASIS.

SOURCE INFORMATION

1) SOURCE NAME:

Page1 Landfill

2) DATE FORM
PREPARED: _____

3) SOURCE ID NO.
(IF KNOWN):

201/801-AAF

4) CAAPP PERMIT NUMBER (IF KNOWN): _____

5) IS THIS THE FIRST SUBMITTAL OF THIS FORM?



YES



NO

IF NO, WHAT IS THE REPORTING PERIOD
COVERED BY THIS FORM? _____ / _____ / _____ TO: _____ / _____ / _____

SOURCE COMPLIANCE INFORMATION

6) DOES THE SIGNATORY OF THIS FORM HEREBY CERTIFY THAT THE SOURCE IS IN COMPLIANCE WITH ALL
APPLICABLE REQUIREMENTS?



YES



NO

IF NO, EXPLAIN:

7) PROVIDE THE SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATION DURING THE PERMIT TERM, E.G.,
ONCE ANNUALLY IN JANUARY (NOTE THAT SUCH CERTIFICATION MUST BE SUBMITTED NO LESS FREQUENTLY
THAN ANNUALLY):

Compliance Certification is to be Submitted Annually.

8) INDICATE THE COMPLIANCE STATUS OF THE SOURCE WITH ANY APPLICABLE ENHANCED MONITORING AND
COMPLIANCE CERTIFICATION REQUIREMENTS OF THE CLEAN AIR ACT, E.G., NO ENHANCED MONITORING
REQUIRED AND IN COMPLIANCE WITH COMPLIANCE CERTIFICATION REQUIREMENTS:

Landfill is in Compliance, except for NSPS Gas System Design
Final Annual Reports and Part 70 Application by June 1, 1999.

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992,
CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY
PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN
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9b) LIST THE EMISSION UNITS THAT WERE NOT IN CONTINUOUS COMPLIANCE SINCE THE LAST REPORTING PERIOD, AND THE REASON(S) FOR NONCOMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-2.):

EMISSION UNIT	REASON(S) FOR NONCOMPLIANCE

COMPLIANCE INFORMATION

10) SUMMARY OF METHODS USED TO DETERMINE COMPLIANCE:

a) DESCRIPTION OF TESTING METHODS USED TO DEMONSTRATE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-3.):

10b) DESCRIPTION OF MONITORING PROCEDURES USED TO DEMONSTRATE COMPLIANCE, INCLUDING ANY ENHANCED MONITORING REQUIREMENTS OF THE ACT (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-4.):

c) DESCRIPTION OF RECORDKEEPING USED TO DEMONSTRATE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-5.):

10d) DESCRIPTION OF REPORTING USED TO DEMONSTRATE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-6.):

SIGNATURE BLOCK

NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE RETURNED AS INCOMPLETE.

11) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE.

AUTHORIZED SIGNATURE:

BY:



AUTHORIZED SIGNATURE

Thomas Hilbert

TYPED OR PRINTED NAME OF SIGNATORY

Environmental Engineer

TITLE OF SIGNATORY

02 / 22 / 99

DATE

APPLICATION PAGE _____

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
Date: ____ / ____ / ____
Page ____ of ____
Source Designation: _____

**FEE DETERMINATION FOR
CAAPP PERMIT**

FOR AGENCY USE ONLY

ID NUMBER: _____

PERMIT #: _____

DATE: _____

THE DATA PROVIDED ON THIS FORM WILL BE USED TO DETERMINE THE PERMIT FEE. THE EMISSION LEVELS STATED ON THIS FORM CAN ONLY BE USED FOR THE PURPOSE OF PERMIT FEE DETERMINATION IF THE APPLICANT IS WILLING TO ACCEPT THESE LEVELS AS PERMIT SPECIAL CONDITIONS. EMISSIONS DATA PROVIDED ON THIS FORM MUST BE IDENTICAL TO DATA IN THE "PERMITTED EMISSION RATE" COLUMNS PROVIDED ON THE DATA AND INFORMATION FORM FOR INDIVIDUAL EMISSION UNITS OR CONTROL EQUIPMENT. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS 292-1.

SOURCE INFORMATION

1) SOURCE NAME:

Page1 Landfill

2) DATE FORM
PREPARED: _____

3) SOURCE ID NO.
(IF KNOWN):

201-801-AAF

FEE DATA

4) WILL THE SOURCE PAY THE MAXIMUM FEE OF \$100,000.00 PER YEAR?

☐ YES

☒ NO

IF YES, THE REMAINDER OF THIS FORM DOES NOT NEED TO BE COMPLETED.

5) EMISSION UNIT*	NITROGEN OXIDES (NO _x) (TONS/YR)	PARTICULATE MATTER (PART) (TONS/YR)	SULFUR DIOXIDE (SO ₂) (TONS/YR)	VOLATILE ORGANIC MATERIAL (VOM) (TONS/YR)	OTHER** SPECIFY NMOC (TONS/YR)
Landfill & Flare	80	26	5	10	41
	41.53	19	2.3	8.3	21.2
					HAPs
					4.28

*EMISSION UNIT - PROVIDE THE NAME AND FLOW DIAGRAM DESIGNATION OF THE EMISSION UNIT AS IT APPEARS ON THE DATA AND INFORMATION FORM.

**OTHER - ANY HAZARDOUS AIR POLLUTANT (HAP) NOT INCLUDED ELSEWHERE, E.G., CHLORINE, HCl, ETC.

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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APPENDIX C
RELEVANT SITE PERMITS



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

P. O. Box 19506, Springfield, IL 62794-9506

217-782-2113

OPERATING PERMIT - NESHP SOURCE

PERMITTEE

NRG Technologies, Inc.
Attn: Steve Marzorati
8403 Lindenwood Road
Rockford, IL 61109

Application No.: 84110018

I.D. No.: 201808ADB

Applicant's Designation: DEHYDRATOR

Date Received: June 5, 1996

Subject: Rotary Drum Dehydrator

Date Issued: August 26, 1996

Expiration Date: August 31, 2000

Location: 8403 Lindenwood, Rockford

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of Sludge Dehydrator, Landfill Gas Processing System, one 15,000 gallon fuel oil tank, and one 20,000 gallon fuel oil tank, as described in the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. The dehydrator when drying wastewater treatment sludge is subject to a Nation Emission Standard for Hazardous Air Pollutants (NESHP) for Mercury, 40 CFR 61, Subparts A and E. The Illinois EPA is administering NESHP in Illinois on behalf of the United States EPA under a delegation agreement.
 - b. The mercury emissions from the dehydrator when drying wastewater treatment sludge shall not exceed 3,200 grams per 24 hour period, pursuant to the National Emission Standard for Hazardous Air Pollutants.
 - c. At all times, the Permittee shall also, to the extent practicable maintain and operate the dehydrator, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
2. The materials dried in the dehydrator shall be limited to the following material and rates.
 - a. The wet sludge feed rate shall not exceed 10 tons/hour.
 - b. The wet poultry manure feed rate shall not exceed 5 tons/hour.
- Operational records shall be maintained for Agency inspection of type material being dried, landfill gas usage, natural gas usage, material dried, operating time, and afterburner combustion chamber temperature recording charts.

Page 2

4. Any required reports and notifications concerning equipment operation performance testing or a continuous monitoring system shall be sent to the Agency's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

If you have any questions please contact Jim Cobb at 217-782-2113.

Donald E. Sutton/ha

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:JDC/62392JDC.DOC

cc: FOS Region 2
IEPA, CMU (#40)
USEPA, Region V



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

P. O. Box 19506, Springfield, IL 62794-9506

217/782-2113

July 24, 1998

I.D. Number 201808ADB

ENVIRONMENTAL COORDINATOR
NRG TECHNOLOGY INC
8403 LINDENWOOD RD
ROCKFORD, IL 61109

Re: Extension of January 25, 1995 Transition Policy

This letter is to notify your Source that on July 10, 1998 the USEPA extended the January 25, 1995 potential to emit (PTE) transition policy deadline from July 31, 1998 to December 31, 1999 (copy enclosed).

Therefore, the Illinois EPA's previous acceptance of your request for registration as a 'Non-Major Source Based Upon Actual Emission Levels' is still valid and is extended to December 31, 1999. Pursuant to this extension, you must establish enforceable limitations for this Source by December 31, 1999, in a Federally Enforceable State Operating Permit (FESOP) to maintain non-major source status. If enforceable limitations have not been established by that date, a CAAPP permit will be required.

As you are aware your Source is required to maintain adequate records demonstrating that your actual emissions are 50% or less of applicable major source thresholds. In order to maintain your non-major source status, emissions must remain below this level until enforceable limitations are established.

If you have any questions, please call the Permit Section at 217/782-2113.

Sincerely,

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:BEA:trans99

cc: Regional Office
I.D. File
Dave Kolaz - CASM

Enclosure (1)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 10, 1998

MEMORANDUM

SUBJECT: Second Extension of January 25, 1995 Potential to Emit
Transition Policy and Clarification of Interim Policy

FROM: John S. Scitz, Director *John Scitz*
Office of Air Quality Planning and Standards (MD-10)

Eric V. Schaeffer, Director *Eric Schaeffer*
Office of Regulatory Enforcement (2241A)

TO: See Addressees

This memorandum further extends the Environmental Protection Agency's (EPA) January 25, 1995 transition policy for potential to emit (PTE) limits relative to maximum achievable control technology (MACT) standards issued under section 112 of the Clean Air Act and federal operating permits issued under Title V programs. It also clarifies how the EPA's interim policy on PTE, first discussed in a January 22, 1996 memorandum, works with the transition policy.

Background

Many Clean Air Act requirements apply only to "major" sources, that is, those sources whose actual or potential emissions of air pollution exceed threshold emissions levels specified in the Act. A source's total potential to emit is determined by a two step process. First, the source's potential emissions at maximum physical capacity are established. This figure is then reduced by any recognized, practically enforceable limits on the source's emissions, such as limits on rates of production, hours of operation, and type and amount of fuel burned or materials processed. The three primary programs where PTE is a significant factor are (1) the section 112 MACT program to control emissions of hazardous air pollutants (HAPs); (2) the Title V operating permits program; and (3) the New Source Review (NSR) programs in Part C of Title I (the prevention of significant deterioration (PSD) program) and Part D of Title I (the nonattainment NSR program). These programs each contain a definition of PTE. Due to several court decisions addressing the requirement in EPA's regulatory definition of PTE under these programs that any enforceable limits on potential emissions be federally enforceable, these regulations are currently under review, and the EPA is engaged in a rulemaking process to consider amendments to the current requirements. The EPA has reviewed information provided



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Interim Policy During Period Between D.C. Circuit Opinions and Final PTE Rule

A January 22, 1996 policy memorandum entitled "Release of Interim Policy on Federal Enforceability of Limitations on Potential to Emit" sets forth the EPA's interim policy on federal enforceability during the period prior to the effective date of a final PTE rule (available on the Internet at <http://www.epa.gov/ttn/oaipg/t5pgm.html>). Because there have been several inquiries into the application of the interim policy, the EPA encourages Regions, States and regulated sources to review that policy memorandum, as it still represents the EPA's position. A brief description is provided below.

Section 112: In National Mining Association v. EPA, 59 F.3d 1362 (D.C. Cir. 1995), the D.C. Circuit questioned whether the federal enforceability requirement in the General Provisions to 40 C.F.R. part 63 was "necessary." The court remanded, but did not vacate, the definition of PTE in the General Provisions. Nonetheless, as noted above, since January 25, 1995, in a policy decision prior to the National Mining opinion, the EPA has followed the transition policy regarding what limits are necessary to render a source of hazardous air pollutants a "synthetic minor" source for purposes of section 112. As discussed above, today's memorandum extends the transition policy until December 31, 1999.

Title V: In Clean Air Implementation Project v. EPA, No. 96-1224 (D.C. Cir. June 28, 1996) (CAIP), the court vacated and remanded the requirement for federal enforceability for PTE limits under 40 C.F.R. part 70. The EPA has stated that the term "federally enforceable" in section 70.2 should now be read to mean "federally enforceable or legally and practicably enforceable by a State or local air pollution control agency" pending any additional rulemaking by the EPA.

As stated in the August 1996 memorandum, the EPA interprets the court order vacating the part 70 definition as not affecting any requirement for federal enforceability in existing State rules and programs. Pending the outcome of the current rulemaking effort, the EPA believes that States are not likely to pursue submittals for program revisions. Thus, despite the State program requirements for federal enforceability, there may be States wishing to continue to observe the transition policy -- the transition policy specifically allows States to follow it in determining Title V applicability. Therefore, as stated above, the EPA is extending the transition policy as it relates to Title V permitting until December 31, 1999.

New Source Review: In Chemical Manufacturers Association v. EPA, No. 89-1514 (D.C. Cir. Sept. 15, 1995) the court remanded and vacated the federal enforceability requirement in the federal NSR/PSD rules. The EPA reiterates that neither the January 25, 1995 transition policy, the opinion in National Mining nor the court order in CAIP impacts the NSR or PSD programs. A full discussion of the EPA's policy with respect to PTE issues related to the NSR and PSD programs is presented in the January 22, 1996 policy memorandum.

In brief, that memorandum states that the court's order in Chemical Manufacturers Association did not impact the individual state rules implementing these programs that have been incorporated into EPA-approved State Implementation Plans (SIPs). Thus, the order's practical

impacts on NSR/PSD programs are not substantial for new construction -- federal enforceability is still required to create "synthetic minor" new and modified sources in most circumstances pending completion of the PTE rulemaking. The precise impact of the vacatur on NSR/PSD applicability can be definitively determined only by reviewing the applicable SIP provisions.

Distribution/Further Information

We are asking Regional Offices to send this memorandum to States within their jurisdiction. Questions concerning specific issues and cases should be directed to the appropriate Regional Office. The Regional Office staff may contact John Walke of the Office of General Counsel at 202-260-9856; or Carol Holmes of the Office of Regulatory Enforcement at 202-564-8709. The document is also available on the Internet, at <http://www.epa.gov/ttn/oarpg>, under "OAR Policy and Guidance Information."

Addressees:

Director, Office of Ecosystem Protection, Region I
Director, Division of Environmental Planning and Protection,
Region II
Director, Division of Air Quality, Region III
Director, Air, Pesticides, and Toxics Management Division, Region IV
Director, Air and Radiation Division, Region V
Director, Multimedia Planning and Permitting Division, Region VI
Director, Air, RCRA, and TSCA Division, Region VII
Assistant Regional Administrator, Office of Pollution Prevention,
State, and Tribal Assistance, Region VIII
Director, Air and Toxics Division, Region IX
Director, Office of Air, Region X
Regional Counsels, Regions I-X
Director, Office of Environmental Stewardship, Region I
Director, Division of Enforcement and Compliance Assurance,
Region II
Director, Enforcement Coordination Office, Region III
Director, Compliance Assurance and Enforcement Division, Region VI
Director, Enforcement Coordination Office, Region VII
Assistant Regional Administrator, Office of Enforcement, Compliance
and Environmental Justice, Region VIII
Enforcement Coordinator, Office of Regional Enforcement
Coordination, Region IX

cc: C. Holmes (2242A)
J. Ketcham-Colwill (6103)
J. Walke (2344)
L. Hutchinson (MD12)



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62705

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter III 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Permit Management Center.

APPLICATION FOR A PERMIT (A)

☒ CONSTRUCT ☐ OPERATE

FOR AGENCY USE ONLY

I. D. NO. _____

PERMIT NO. _____

DATE _____

NAME OF EQUIPMENT TO BE
CONSTRUCTED OR OPERATED

Rotary Dryer Replacement

(B)

3. NAME OF OWNER: NRG Technologies, Inc.		2a. NAME OF OPERATOR: NRG Technologies, Inc.	
b. STREET ADDRESS OF OWNER: 8403 Lindenwood Road		2b. STREET ADDRESS OF OPERATOR: 8403 Lindenwood Road	
c. CITY OF OWNER: Rockford		2c. CITY OF OPERATOR: Rockford	
d. STATE OF OWNER: Illinois	1c. ZIP CODE: 61109	2d. STATE OF OPERATOR: Illinois	2e. ZIP CODE: 61109

3. NAME OF CORPORATE DIVISION OR PLANT: NRG Technologies, Inc.		3b. STREET ADDRESS OF EMISSION SOURCE: 8403 Lindenwood Road	
c. CITY OF EMISSION SOURCE: Rockford	3d. LOCATED WITHIN CITY LIMITS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	3e. TOWNSHIP: Rockford	3f. COUNTY: Winnebago
		3g. ZIP CODE: 61109	

4. CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) John D. Lichty, Manager		5. TELEPHONE NUMBER FOR AGENCY TO CALL: 815-874-4806
6. ADDRESS FOR CORRESPONDENCE: (CHECK ONLY ONE) <input type="checkbox"/> OWNER: <input checked="" type="checkbox"/> OPERATOR <input type="checkbox"/> EMISSION SOURCE		7. YOUR DESIGNATION FOR THIS APPLICATION: (c) _____

I, THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATION REMAINS TRUE, CORRECT AND CURRENT. BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION.

AUTHORIZED SIGNATURE(S): (d)

BY _____ DATE _____
SIGNATURE
Gary L. Marzorati
TYPED OR PRINTED NAME OF SIGNER
President
TITLE OF SIGNER

BY _____ DATE _____
SIGNATURE
John D. Lichty
TYPED OR PRINTED NAME OF SIGNER
Manager
TITLE OF SIGNER

- A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS FORM MAY ONLY BE USED TO REQUEST ONE TYPE OF PERMIT - CONSTRUCTION OR OPERATION - AND NOT BOTH.
- B) ENTER THE GENERIC NAME OF THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS NAME WILL APPEAR ON THE PERMIT WHICH MAY BE ISSUED PURSUANT TO THIS APPLICATION. THIS FORM MUST BE ACCOMPANIED BY OTHER APPLICABLE FORMS AND INFORMATION.
- C) PROVIDE A DESIGNATION IN ITEM 7 ABOVE WHICH YOU WOULD LIKE THE AGENCY TO USE FOR IDENTIFICATION OF YOUR EQUIPMENT. YOUR DESIGNATION WILL BE REFERENCED IN CORRESPONDENCE FROM THIS AGENCY RELATIVE TO THIS APPLICATION. YOUR DESIGNATION MUST NOT EXCEED TEN (10) CHARACTERS.
- D) THIS APPLICATION MUST BE SIGNED IN ACCORDANCE WITH PCB REGS., CHAPTER 2, PART 1, RULE 103(a)(4) OR 103(b)(5) WHICH STATES: "ALL APPLICATIONS AND SUPPLEMENTS THERETO SHALL BE SIGNED BY THE OWNER AND OPERATOR OF THE EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT, OR THEIR AUTHORIZED AGENT, AND SHALL BE ACCOMPANIED BY EVIDENCE OF AUTHORITY TO SIGN THE APPLICATION."

THE OWNER OR OPERATOR IS A CORPORATION. SUCH CORPORATION MUST HAVE ON FILE WITH THE AGENCY A CERTIFIED COPY OF A RESOLUTION OF THE CORPORATION'S BOARD OF DIRECTORS AUTHORIZING THE PERSONS SIGNING THIS APPLICATION TO CAUSE OR ALLOW THE CONSTRUCTION OR OPERATION OF THE EQUIPMENT TO BE COVERED BY THE PERMIT.



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

P. O. Box 19506, Springfield, IL 62794-9506

217/782-2113

OPERATING PERMIT

PERMITTEE

Winnebago Reclamation Service, Inc.
Attn: Gary L. Marzorati
4920 Forest Hills Road
Loves Park, IL 61111

Application No.: 94070003

I.D. No.: 201801AAF

Applicant's Designation: FLARE-WRS

Date Received: January 14, 1997

Subject: Flare Station

Date Issued: February 4, 1997

Operating Permit Expiration

Date: February 4, 2002

Location: 8403 Lindenwood Road, Rockford

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a flare station for combustion of landfill gas as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. The flare station shall be operated and maintained for effective combustion of landfill gas. Flame monitor(s) shall be installed, operated and maintained on the flare system to confirm the presence of a flame when landfill gas is being fed.
2. The landfill gas consumption of the flare station in million cubic feet (mcf) shall not exceed 1.44 mcf/day and 525.6 mcf/year.
- 3a. Emissions of nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂) and volatile organic material (VOM) and operation of the flare station shall not exceed the following limits:

Emission Source	Gas Flow Rate (scfm)	E M I S S I O N S								VOM	
		NO _x lb/hr	ton/yr	lb/hr	ton/yr	CO lb/hr	ton/yr	SO ₂ lb/hr	ton/yr	lb/hr	ton/yr
Flare Station	1000	2.7	11.83	19.0	83.22	0.8		3.5	1.1		4.82

The NO_x, CO and SO₂ emission limits are based on the maximum gas flow rate allowed and using standard emission factors. The VOM emission limits are based on the maximum concentration of VOM in the landfill gas of 4,000 PPMV measured as hexane at a maximum flow rate of 1,000 scfm and the flare achieving a destruction efficiency of 98%.

- b. This permit is issued based on negligible emissions of particulate matter from the flare station. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- c. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. The Permittee shall install, maintain and operate a continuous monitoring system to monitor and record the fuel consumption for the flare station.
- 5a. The Permittee shall sample and analyze the landfill gas entering the flare station at least once every six months for net heating value, methane, sulfur compounds and non methane organic materials. A report of the analysis result must be submitted to the Agency within 30 days of the sampling.
- b. The Agency will revise this requirement to allow for annual analysis of the landfill gas upon written request from the Permittee, if the Permittee can demonstrate that the measured values remain relatively constant based on the gas analysis data of at least two years.
- 6a. The Permittee shall keep the following records:
 - i. The landfill gas consumption by the flare station, on a daily basis.
 - ii. Record of flare station inspection/maintenance completed log, and operating condition of the flare station. This log should at least include the following:
 - A. Date of inspection.
 - B. Date maintenance performed and completed.
 - C. Type of maintenance needed.
- b. The Permittee shall keep records of the sampling and analysis of landfill gas required by Condition 5.
7. All records required by this permit shall be retained at a readily accessible location at the plant for at least 3 years from the date of entry and shall be made available for inspection and copying by the Agency upon request.
8. Upon exceedance of the requirements of this permit determined by the records required by this permit or any violation of the requirements of this permit, the Permittee shall submit a report to the Agency within 30 days after the exceedance. The report shall include the hourly emissions occurring during the times of exceedance, a copy of the relevant records and a description of the exceedance or violation and efforts to reduce emissions and future occurrences. This report should be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
1340 North Ninth Street
P.O. Box 19276
Springfield, Illinois 62794-9276

Page 3

9. With the Annual Emission report required to be submitted to the Agency pursuant to 35 Ill. Adm. Code Part 254, the Permittee shall report the annual emissions of nitrogen oxides, volatile organic material, carbon monoxide, and sulfur dioxide with supporting calculations and a description of any exceedance of applicable limitations of this permit, if not previously reported.

It should be noted that this permit has been revised to include operation of the equipment described in construction permit 97010035.

It should also be noted that the issuance of this permit supersedes all other permit(s) issued under this application number.

If you have any questions on this, please call Rizwan Syed at 217/782-2113.

DES

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

h
DES:RS:jar

cc: Region 2



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

**STANDARD CONDITIONS
FOR
OPERATING PERMITS**

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special permit condition(s).

1. The issuance of this permit does not release the permittee from compliance with state and federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or with applicable local laws, ordinances and regulations.
2. The Agency has issued this permit based upon the information submitted by the permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under 35 Ill. Adm. Code 201.207.
3.
 - a. The permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Agency and unless a new permit or revision of the existing permit(s) is issued for such modification.
 - b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.
4. The permittee shall allow any duly authorized agent of the Agency, upon the presentation of credentials, at reasonable times:
 - a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,
 - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. to obtain and remove samples of any discharge or emission of pollutants, and
 - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located,
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the facilities,



Foth & Van Dyke

engineers · architects · scientists

JLD 8-24-95

January 9, 1997

Mr. Donald Sutton, P.E.
Manager, Air Permit Section
Division of Air Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19506
Springfield, IL 62794-9276

RECEIVED

JAN 14 1997

IEPA - DAPC - SPFLD

Dear Mr. Sutton:

Re: Permit No.: 201801AAF

Application for a Modification to an Existing Construction and Operating Permit

IEPA Site Number: 2018080001

Pagel Landfill Facility North and South Unit

On behalf of Winnebago Reclamation Service (WRS), Foth & Van Dyke is submitting two copies of a *Joint State Construction and Operating Permit Modification* for an enclosed landfill gas combustion flare. This is a modification to the existing construction and operating permit for a utility flare. WRS has not yet installed the permitted utility flare and proposes to install an enclosed flare of the utility flare.

Section 1 of the application includes a description and figures of the facility. Sections 2 contain the appropriate process forms and emissions calculations for the enclosed flare.

If you have any questions or would like any additional information, please feel free to call Mr. Thomas Hilbert at (815) 874-4806.

Sincerely,

Foth & Van Dyke

Katie J. Roberts
Environmental Engineer

Mark A. DiFonzo, P.E.
Senior Technical Consultant

KJR:MAD1:tlm2

Enclosure

TLM2\95W082\R-WINN\10000

**Joint State Construction and Operating Permit Modification
Enclosed Landfill Gas Flare - Winnebago Reclamation Service, Inc.**

Distribution

No. of Copies

Sent To

2

Mr. Donald Sutton, P.E.
Manager, Air Permit Section
Division of Air Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62794-9276

2

Mr. Thomas Hilbert
Environmental Engineer
Winnebago Reclamation Service, Inc.
4920 Forest Hills Road
Loves Park, IL 61111

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62794-9276

<p style="text-align: center;">APPLICATION FOR PERMIT ^(A)</p> <p> <input checked="" type="checkbox"/> CONSTRUCT <input checked="" type="checkbox"/> OPERATE </p> <p>NAME OF EQUIPMENT TO BE CONSTRUCTED OR OPERATED <u>Flare Station</u> (B)</p>	<p style="text-align: center;">FOR AGENCY USE ONLY</p> <p>I.D. NO. <u>201801AAJF</u></p> <p>PERMIT NO. _____</p> <p>DATE <u>1-14-97</u></p>
--	---

1a. NAME OF OWNER: <u>Winnebago Reclamation Service, Inc.</u>		2a. NAME OF OPERATOR: <u>Winnebago Reclamation Service, Inc.</u>	
1b. STREET ADDRESS OF OWNER: <u>4920 Forest Hills Road</u>		2b. STREET ADDRESS OF OPERATOR: <u>4920 Forest Hills Road</u>	
1c. CITY OF OWNER: <u>Loves Park</u>		2c. CITY OF OPERATOR: <u>Loves Park</u>	
1d. STATE OF OWNER: <u>Illinois</u>	1e. ZIP CODE: <u>61111</u>	2d. STATE OF OPERATOR: <u>Illinois</u>	2e. ZIP CODE: <u>61111</u>

3a. NAME OF CORPORATE DIVISION OR PLANT: <u>Pagel Landfill</u>		3b. STREET ADDRESS OF EMISSION SOURCE: <u>8403 Lindenwood Road</u>		
3c. CITY OF EMISSION SOURCE: <u>Rockford</u>	3d. LOCATED WITHIN CITY LIMITS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	3e. TOWNSHIP: <u>36</u>	3f. COUNTY: <u>Winnebago</u>	3g. ZIP CODE: <u>61109</u>

4. ALL CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) <u>Gary L. Marzorati</u>		5. TELEPHONE NUMBER FOR AGENCY TO CALL: <u>(815) 654-4779</u>	
6. ADDRESS FOR CORRESPONDENCE: (CHECK ONLY ONE) <input checked="" type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input type="checkbox"/> EMISSION SOURCE		7. YOUR DESIGNATION FOR THIS APPLICATION: ^(C) <u>FLARE - WRS</u>	

8. THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATION REMAINS TRUE, CORRECT AND CURRENT. BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION.

RECEIVED

<p>AUTHORIZED SIGNATURE(S):</p> <p>BY <u><i>[Signature]</i></u> <u>12-30-96</u> SIGNATURE DATE <u>Gary L. Marzorati</u> TYPED OR PRINTED NAME OF SIGNER <u>Executive Vice President</u> TITLE OF SIGNER</p>	<p>BY _____ <u>JAN 14 1997</u> SIGNATURE DATE TYPED OR PRINTED NAME OF SIGNER <u>John J. Marzorati</u> TITLE OF SIGNER</p>
--	--

"OFFICIAL SEAL"
SALLY LOIS GUAMALTA
Notary Public, State of Illinois
My Commission Expires 09-07-00

(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS FORM MAY BE USED TO REQUEST A CONSTRUCTION PERMIT, AN OPERATING PERMIT, A CONSTRUCTION OR OPERATING PERMIT.

(B) ENTER THE GENERIC NAME OF THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS NAME WILL APPEAR ON THE PERMIT WHICH MAY BE ISSUED PURSUANT TO THIS APPLICATION. THIS FORM MUST BE ACCOMPANIED BY OTHER APPLICABLE FORMS AND INFORMATION.

(C) PROVIDE A DESIGNATION IN ITEM 7 ABOVE WHICH YOU WOULD LIKE THE AGENCY TO USE FOR IDENTIFICATION OF YOUR EQUIPMENT. YOUR DESIGNATION WILL BE REFERENCED IN CORRESPONDENCE FROM THIS AGENCY RELATIVE TO THIS APPLICATION. YOUR DESIGNATION MUST NOT EXCEED TEN (10) CHARACTERS.

(D) THIS APPLICATION MUST BE SIGNED IN ACCORDANCE WITH 35 ILL. ADM. CODE 201.154 OR 201.159 WHICH STATES: "ALL APPLICATIONS AND SUPPLEMENTS THERETO SHALL BE SIGNED BY THE OWNER AND OPERATOR OF THE EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT, OR THEIR AUTHORIZED AGENT, AND SHALL BE ACCOMPANIED BY EVIDENCE OF AUTHORITY TO SIGN THE APPLICATION."

IF THE OWNER OR OPERATOR IS A CORPORATION, SUCH CORPORATION MUST HAVE ON FILE WITH THE AGENCY A CERTIFIED COPY OF A RESOLUTION OF THE CORPORATION'S BOARD OF DIRECTORS AUTHORIZING THE PERSONS SIGNING THIS APPLICATION TO CAUSE OR ALLOW THE CONSTRUCTION OR OPERATION OF THE EQUIPMENT TO BE COVERED BY THE PERMIT.

9. DOES THIS APPLICATION CONTAIN A PLOT PLAN/MAP:

☒ YES ☐ NO

IF A PLOT PLAN/MAP HAS PREVIOUSLY BEEN SUBMITTED, SPECIFY:

AGENCY I.D. NUMBER _____ APPLICATION NUMBER _____

IS THE APPROXIMATE SIZE OF APPLICANT'S PREMISES LESS THAN 1 ACRE?

☐ YES ☒ NO: SPECIFY 235 ACRES

10. DOES THIS APPLICATION CONTAIN A PROCESS FLOW DIAGRAM(S) THAT ACCURATELY AND CLEARLY REPRESENTS CURRENT PRACTICE.

☒ YES ☐ NO

11a. WAS ANY EQUIPMENT, COVERED THIS APPLICATION, OWNED OR CONTRACTED FOR, BY THE APPLICANT PRIOR TO APRIL 14, 1972:

☐ YES ☒ NO

IF "YES" ATTACH AN ADDITIONAL SHEET, EXHIBIT A, THAT:

- (a) LISTS OR DESCRIBES THE EQUIPMENT
(b) STATES WHETHER THE EQUIPMENT WAS IN COMPLIANCE WITH THE RULES AND REGULATIONS GOVERNING THE CONTROL OF AIR POLLUTION PRIOR TO APRIL 4, 1972

11b. HAS ANY EQUIPMENT, COVERED BY THIS APPLICATION, NOTPREVIOUSLY RECEIVED AN OPERATING PERMIT:

☒ YES ☐ NO

IF "YES", ATTACH AN ADDITIONAL SHEET, EXHIBIT B, THAT:

- (a) LISTS OR DESCRIBES THE EQUIPMENT
(b) STATES WHETHER THE EQUIPMENT
(i) IS ORIGINAL OR ADDITIONAL EQUIPMENT
(ii) REPLACES EXISTING EQUIPMENT, OR
(iii) MODIFIES EXISTING EQUIPMENT
(c) PROVIDES THE ANTICIPATED OR ACTUAL DATES OF THE COMMENCEMENT OF CONSTRUCTION AND THE START-UP OF THE EQUIPMENT

12. IF THIS APPLICATION INCORPORATES BY REFERENCE A PREVIOUSLY GRANTED PERMIT(S), HAS FORM APC-210, "DATA AND INFORMATION—INCORPORATION BY REFERENCE" BEEN COMPLETED.

13. DOES THE STARTUP OF AN EMISSION SOURCE COVERED BY THIS APPLICATION PRODUCE AIR CONTAMINANT EMISSION IN EXCESS OF APPLICABLE STANDARDS:

☐ YES ☒ NO

IF "YES," HAS FORM APC-203, "OPERATION DURING STARTUP" BEEN COMPLETED FOR THIS SOURCE.

☐ YES ☐ NO

14. DOES THIS APPLICATION REQUEST PERMISSION TO OPERATE AN EMISSION SOURCE DURING MALFUNCTIONS OR BREAKDOWNS:

☐ YES ☒ NO

IF "YES," HAS FORM APC-204, "OPERATION DURING MALFUNCTION AND BREAKDOWN" BEEN COMPLETED FOR THIS SOURCE

☐ YES ☐ NO

15. IS AN EMISSION SOURCE COVERED BY THIS APPLICATION SUBJECT TO A FUTURE COMPLIANCE DATE:

☐ YES ☒ NO

IF "YES," HAS FORM APC-202, "COMPLIANCE PROGRAM & PROJECT COMPLETION SCHEDULE," BEEN COMPLETED FOR THIS SOURCE:

☐ YES ☐ NO

16. DOES THE FACILITY COVERED BY THIS APPLICATION REQUIRE AN EPISODE ACTION PLAN (REFER TO GUIDELINES FOR EPISODE ACTION PLANS):

☐ YES ☒ NO

17. LIST AND IDENTIFY ALL FORMS, EXHIBITS, AND OTHER INFORMATION SUBMITTED AS PART OF THIS APPLICATION. INCLUDE THE PAGE NUMBERS OF EACH ITEM (ATTACH ADDITIONAL SHEETS IF NECESSARY):

Please see Table of Contents.

TOTAL NUMBER OF PAGES _____

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62794-9276

APPLICATION FOR PERMIT ^(A)		FOR AGENCY USE ONLY	
<input checked="" type="checkbox"/> CONSTRUCT <input checked="" type="checkbox"/> OPERATE		I.D. NO. <u>201801AAT</u>	
NAME OF EQUIPMENT TO BE CONSTRUCTED OR OPERATED <u>Flare Station</u> (B)		PERMIT NO. _____	
		DATE <u>1-14-97</u>	

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1c. CITY OF OWNER: <u>Loves Park</u>		2c. CITY OF OPERATOR: <u>Loves Park</u>	
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AUTHORIZED SIGNATURE(S): [Signature] 12-30-96 DATE

BY Gary L. Marzorati SIGNATURE JAN 14 1997 DATE

TYPED OR PRINTED NAME OF SIGNER Executive Vice President TYPED OR PRINTED NAME OF SIGNER MARK DARG - STAFF

TITLE OF SIGNER _____ TITLE OF SIGNER _____

"OFFICIAL SEAL"
SALLY LOIS GRAMALIA
Notary Public, State of Illinois
My Commission Expires 09-07-00
Sally Lois Gramalia 12-30-96

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☐ YES ☒ NO

IF "YES" ATTACH AN ADDITIONAL SHEET, EXHIBIT A, THAT:

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11b. HAS ANY EQUIPMENT, COVERED BY THIS APPLICATION, NOT PREVIOUSLY RECEIVED AN OPERATING PERMIT:

☒ YES ☐ NO

IF "YES", ATTACH AN ADDITIONAL SHEET, EXHIBIT B, THAT:

- (a) LISTS OR DESCRIBES THE EQUIPMENT
- (b) STATES WHETHER THE EQUIPMENT
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APPLICATION FOR OPERATING PERMIT ONLY

13. DOES THE STARTUP OF AN EMISSION SOURCE COVERED BY THIS APPLICATION PRODUCE AIR CONTAMINANT EMISSION IN EXCESS OF APPLICABLE STANDARDS:

☐ YES ☒ NO

IF "YES," HAS FORM APC-203, "OPERATION DURING STARTUP" BEEN COMPLETED FOR THIS SOURCE.

☐ YES ☐ NO

14. DOES THIS APPLICATION REQUEST PERMISSION TO OPERATE AN EMISSION SOURCE DURING MALFUNCTIONS OR BREAKDOWNS:

☐ YES ☒ NO

IF "YES," HAS FORM APC-204, "OPERATION DURING MALFUNCTION AND BREAKDOWN" BEEN COMPLETED FOR THIS SOURCE

☐ YES ☐ NO

15. IS AN EMISSION SOURCE COVERED BY THIS APPLICATION SUBJECT TO A FUTURE COMPLIANCE DATE:

☐ YES ☒ NO

IF "YES," HAS FORM APC-202, "COMPLIANCE PROGRAM & PROJECT COMPLETION SCHEDULE," BEEN COMPLETED FOR THIS SOURCE:

☐ YES ☐ NO

16. DOES THE FACILITY COVERED BY THIS APPLICATION REQUIRE AN EPISODE ACTION PLAN (REFER TO GUIDELINES FOR EPISODE ACTION PLANS):

☐ YES ☒ NO

17. LIST AND IDENTIFY ALL FORMS, EXHIBITS, AND OTHER INFORMATION SUBMITTED AS PART OF THIS APPLICATION. INCLUDE THE PAGE NUMBERS OF EACH ITEM (ATTACH ADDITIONAL SHEETS IF NECESSARY):

Please see Table of Contents.

TOTAL NUMBER OF PAGES _____



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1.2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

*DATA AND INFORMATION
PROCESS EMISSION SOURCE

*THIS INFORMATION FORM IS TO BE COMPLETED FOR AN EMISSION SOURCE OTHER THAN A FUEL COMBUSTION EMISSION SOURCE OR AN INCINERATOR. A FUEL COMBUSTION EMISSION SOURCE IS A FURNACE, BOILER, OR SIMILAR EQUIPMENT USED PRIMARILY FOR PRODUCING HEAT OR POWER BY INDIRECT HEAT TRANSFER. AN INCINERATOR IS AN APPARATUS IN WHICH REFUSE IS BURNED.

1. NAME OF PLANT OWNER: Winnebago Reclamation Service, Inc.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER):
3. STREET ADDRESS OF EMISSION SOURCE: 8403 Lindenwood Road	4. CITY OF EMISSION SOURCE: Rockford, Illinois

GENERAL INFORMATION		
5. NAME OF PROCESS: Pagal Landfill - generating landfill gas		6. NAME OF EMISSION SOURCE EQUIPMENT: N/A
7. EMISSION SOURCE EQUIPMENT MANUFACTURER: N/A	8. MODEL NUMBER: N/A	9. SERIAL NUMBER: N/A
10. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE: N/A		
11. IDENTITY(S) OF ANY SIMILAR SOURCE(S) AT THE PLANT OR PREMISES NOT COVERED BY THE FORM (IF THE SOURCE IS COVERED BY ANOTHER APPLICATION, IDENTIFY THE APPLICATION): N/A		
12. AVERAGE OPERATING TIME OF EMISSION SOURCE: 24 HRS/DAY 7 DAYS/WK 52 WKS/YR		13. MAXIMUM OPERATING TIME OF EMISSION SOURCE: 24 HRS/DAY 7 DAYS/WK 52 WKS/YR
14. PERCENT OF ANNUAL THROUGHPUT: DEC-FEB 25 % MAR-MAY 25 % JUN-AUG 25 % SEPT-NOV 25 %		

INSTRUCTIONS
1. COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
2. COMPLETE THE RAW MATERIAL, PRODUCT, WASTE MATERIAL, AND FUEL USAGE SECTIONS FOR THE PARTICULAR SOURCE EQUIPMENT. COMPOSITIONS OF MATERIALS MUST BE SUFFICIENTLY DETAILED TO ALLOW DETERMINATION OF THE NATURE AND QUANTITY OF POTENTIAL EMISSIONS. IN PARTICULAR, THE COMPOSITION OF PAINTS, INKS, ETC., AND ANY SOLVENTS MUST BE FULLY DETAILED.
3. EMISSION AND EXHAUST POINT INFORMATION MUST BE COMPLETED, UNLESS EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
4. OPERATING TIME AND CERTAIN OTHER ITEMS REQUIRE BOTH AVERAGE AND MAXIMUM VALUES.
5. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS," APC-201.

DEFINITIONS
AVERAGE - THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE, OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY: AVERAGE OPERATING TIME - ACTUAL TOTAL HOURS OF OPERATION FOR THE PRECEDING TWELVE MONTH PERIOD. AVERAGE RATE - ACTUAL TOTAL QUANTITY OF "MATERIAL" FOR THE PRECEDING TWELVE MONTH PERIOD, DIVIDED BY THE AVERAGE OPERATING TIME. AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.
MAXIMUM - THE GREATEST VALUE ATTAINABLE OR ATTAINED FROM THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY: MAXIMUM OPERATING TIME - GREATEST EXPECTED TOTAL HOURS OF OPERATIONS FOR ANY TWELVE MONTH PERIOD. MAXIMUM RATE - GREATEST QUANTITY OF "MATERIAL" EXPECTED PER ANY ONE HOUR OF OPERATION. MAXIMUM OPERATION - GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

RAW MATERIAL INFORMATION

NAME OF RAW MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
20a. N/A	b. LB/HR	c. LB/HR
21a.	b. LB/HR	c. LB/HR
22a.	b. LB/HR	c. LB/HR
23a.	b. LB/HR	c. LB/HR
24a.	b. LB/HR	c. LB/HR

PRODUCT INFORMATION

NAME OF PRODUCT	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
30a. N/A	b. LB/HR	c. LB/HR
31a.	b. LB/HR	c. LB/HR
32a.	b. LB/HR	c. LB/HR
33a.	b. LB/HR	c. LB/HR
34a.	b. LB/HR	c. LB/HR

WASTE MATERIAL INFORMATION

NAME OF WASTE MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
40a. N/A	b. LB/HR	c. LB/HR
41a.	b. LB/HR	c. LB/HR
42a.	b. LB/HR	c. LB/HR
43a.	b. LB/HR	c. LB/HR
44a.	b. LB/HR	c. LB/HR

*FUEL USAGE INFORMATION

FUEL USED	TYPE	HEAT CONTENT
50a. NATURAL GAS <input type="checkbox"/>	b. _____	c. 1000 BTU/SCF
OTHER GAS <input type="checkbox"/>		BTU/SCF
OIL <input type="checkbox"/>		BTU/GAL
COAL <input type="checkbox"/>		BTU/LB
OTHER <input type="checkbox"/>		BTU/LB
d. AVERAGE FIRING RATE PER IDENTICAL SOURCE: BTU/HR		e. MAXIMUM FIRING RATE PER IDENTICAL SOURCE: BTU/HR

*THIS SECTION IS TO BE COMPLETED FOR ANY FUEL USED DIRECTLY IN THE PROCESS EMISSION SOURCE, E.G. GAS IN A DRYER, OR COAL IN A MELT FURNACE.

EMISSION INFORMATION

51. NUMBER OF IDENTICAL SOURCES (DESCRIBE AS REQUIRED):

N/A

AVERAGE OPERATION

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	52a. GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	53a. PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	54a. PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	55a. PPM (VOL)	b. LB/HR	c.
SULFUR DIOXIDE	56a. PPM (VOL)	b. LB/HR	c.
** OTHER (SPECIFY)	57a. PPM (VOL)	b. LB/HR	c.

MAXIMUM OPERATION

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	58a. GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	59a. PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	60a. PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	61a. PPM (VOL)	b. LB/HR	c.
SULFUR DIOXIDE	62a. PPM (VOL)	b. LB/HR	c.
** OTHER (SPECIFY)	63a. PPM (VOL)	b. LB/HR	c.

* ITEMS 52 THROUGH 63 NEED NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

** "OTHER" CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

N/A *

*** EXHAUST POINT INFORMATION

64. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT:	
65. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.):	
66. EXIT HEIGHT ABOVE GRADE:	67. EXIT DIAMETER:
68. GREATEST HEIGHT OF NEARBY BUILDINGS: FT	69. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: FT
AVERAGE OPERATION	
70. EXIT GAS TEMPERATURE: °F	72. EXIT GAS TEMPERATURE: °F
71. GAS FLOW RATE THROUGH EACH EXIT: ACFM	73. GAS FLOW RATE THROUGH EACH EACH EXIT: ACFM

*** THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

* Emission and Exhaust Point Information is provided on Form APC-260.



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62701

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*DATA AND INFORMATION

AIR POLLUTION CONTROL EQUIPMENT

*THIS INFORMATION FORM IS FOR AN INDIVIDUAL UNIT OF AIR POLLUTION CONTROL EQUIPMENT OR AN AIR POLLUTION CONTROL SYSTEM.

1. NAME OF OWNER: Winnebago Reclamation Service, Inc.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER):
3. STREET ADDRESS OF CONTROL EQUIPMENT: 8403 Lindenwood Road	4. CITY OF CONTROL EQUIPMENT: Rockford, Illinois
5. NAME OF CONTROL EQUIPMENT OR CONTROL SYSTEM: Flare Station	

INSTRUCTIONS

1. COMPLETE THE ABOVE IDENTIFICATION.
2. COMPLETE THE APPROPRIATE SECTION FOR THE UNIT OF CONTROL EQUIPMENT, OR THE APPROPRIATE SECTIONS FOR THE CONTROL SYSTEM. BE CERTAIN THAT THE ARRANGEMENT OF VARIOUS UNITS IN A CONTROL SYSTEM IS MADE CLEAR IN THE PROCESS FLOW DIAGRAM.
3. COMPLETE PAGE 6 OF THIS FORM, EMISSION INFORMATION AND EXHAUST POINT INFORMATION.
4. EFFICIENCY VALUES SHOULD BE SUPPORTED WITH A DETAILED EXPLANATION OF THE METHOD OF CALCULATION, THE MANNER OF ESTIMATION, OR THE SOURCE OF INFORMATION. REFERENCE TO THIS FORM ANY RELEVANT INFORMATION OR EXPLANATION INCLUDED IN THIS PERMIT APPLICATION.
5. EFFICIENCY VALUES AND CERTAIN OTHER ITEMS OF INFORMATION ARE TO BE GIVEN FOR AVERAGE AND MAXIMUM OPERATION OF THE SOURCE EQUIPMENT. FOR EXAMPLE, "MAXIMUM EFFICIENCY" IS THE EFFICIENCY OF THE CONTROL EQUIPMENT WHEN THE SOURCE IS AT MAXIMUM OPERATION, AND "AVERAGE FLOW RATE" IS THE FLOW RATE INTO THE CONTROL EQUIPMENT WHEN THE SOURCE IS AT AVERAGE OPERATION.
6. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS", APC-201.

DEFINITIONS

- AVERAGE - THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.
- MAXIMUM - THE GREATEST VALUE ATTAINABLE OR ATTAINED FROM THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
MAXIMUM OPERATION - THE GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

ADSORPTION UNIT

1. FLOW DIAGRAM DESIGNATION(S) OF ADSORPTION UNIT:

N/A

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. ADSORBENT:

☐ ACTIVATED CHARCOAL: TYPE _____

☐ OTHER: SPECIFY _____

5. ADSORBATE(S):

6. NUMBER OF BEDS PER UNIT:

7. WEIGHT OF ADSORBENT PER BED:

LB

8. DIMENSIONS OF BED:

THICKNESS _____ IN, SURFACE AREA _____ SQUARE IN

9. INLET GAS TEMPERATURE:

°F

10. PRESSURE DROP ACROSS UNIT:

INCH H₂O GAUGE

11. TYPE OF REGENERATION:

☐ REPLACEMENT

☐ STEAM

☐ OTHER: SPECIFY _____

12. METHOD OF REGENERATION:

☐ ALTERNATE USE OF _____ ENTIRE UNITS

☐ ALTERNATE USE OF _____ BEDS IN A SINGLE UNIT

☐ SOURCE SHUT DOWN ☐ OTHER: DESCRIBE _____

AVERAGE OPERATION OF SOURCE

MAXIMUM OPERATION OF SOURCE

13. TIME ON LINE BEFORE REGENERATION:

MIN/BED

15. TIME ON LINE BEFORE REGENERATION:

MIN/BED

14. EFFICIENCY OF ADSORBER (SEE INSTRUCTION 4):

%

16. EFFICIENCY OF ADSORBER (SEE INSTRUCTION 4):

%

AFTERBURNER

1. FLOW DIAGRAM DESIGNATION(S) OF AFTERBURNER:

N/A

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. COMBUSTION CHAMBER DIMENSIONS:

LENGTH _____ IN, CROSS-SECTIONAL AREA _____ SQUARE IN.

5. INLET GAS TEMPERATURE:

°F

7. FUEL:

☐ GAS

☐ OIL: SULFUR

WT%

6. OPERATING TEMPERATURE OF COMBUSTION CHAMBER:

°F

8. BURNERS PER AFTERBURNER:

@

BTU/HR EACH

9. CATALYST USED:

☐ NO

☐ YES: DESCRIBE CATALYST _____

10. HEAT EXCHANGER USED:

☐ NO

☐ YES: DESCRIBE HEAT EXCHANGER _____

AVERAGE OPERATION OF SOURCE

MAXIMUM OPERATION OF SOURCE

GAS FLOW RATE:

SCFM

13. GAS FLOW RATE:

SCFM

12. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4):

%

14. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4):

%

CYCLONE

1. FLOW DIAGRAM DESIGNATION(S) OF CYCLONE:
N/A

2. MANUFACTURER:

3. MODEL:

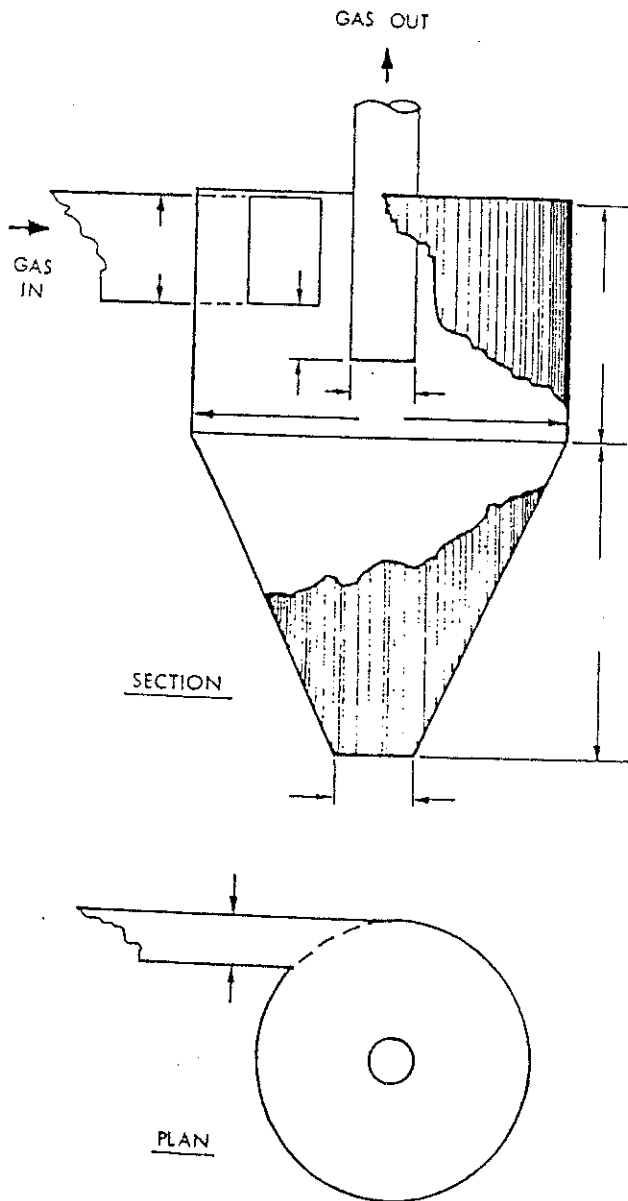
4. TYPE OF CYCLONE:

☐ SIMPLE ☐ MULTIPLE

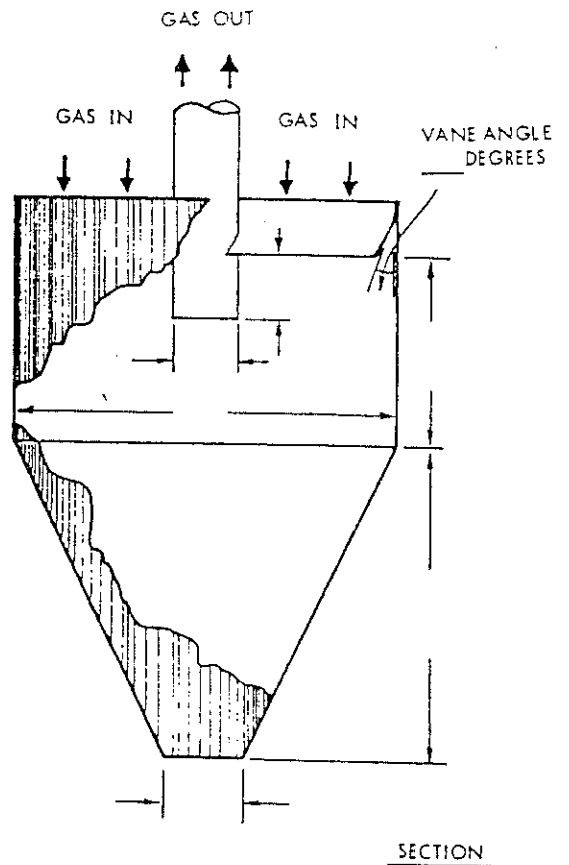
5. NUMBER OF CYCLONES IN EACH MULTIPLE CYCLONE:

6. DIMENSION THE APPROPRIATE SKETCH (IN INCHES) OR PROVIDE A DRAWING WITH EQUIVALENT INFORMATION:

TANGENTIAL INLET CYCLONE



AXIAL INLET CYCLONE
(INDIVIDUAL CYCLONE OF MULTIPLE CYCLONE)



NOT TO SCALE

AVERAGE OPERATION OF SOURCE

7. GAS FLOW RATE:

SCFM

8. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4):

%

MAXIMUM OPERATION OF SOURCE

9. GAS FLOW RATE:

SCFM

10. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4):

%

CONDENSER

1. FLOW DIAGRAM DESIGNATION(S) OF CONDENSER:

N/A

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. HEAT EXCHANGE AREA:

FT²

AVERAGE OPERATION OF SOURCE

MAXIMUM OPERATION OF SOURCE

5. COOLANT FLOW RATE PER CONDENSER:

WATER _____ GPM AIR _____ SCFM

OTHER: TYPE _____, FLOW RATE _____

10. COOLANT FLOW RATE PER CONDENSER:

WATER _____ GPM AIR _____ SCFM

OTHER: TYPE _____, FLOW RATE _____

6. GAS FLOW RATE:

SCFM

11. GAS FLOW RATE:

SCFM

7. COOLANT TEMPERATURE:

INLET _____ °F OUTLET _____ °F

8. GAS TEMPERATURE:

INLET _____ °F OUTLET _____ °F

12. COOLANT TEMPERATURE:

INLET _____ °F OUTLET _____ °F

13. GAS TEMPERATURE:

INLET _____ °F OUTLET _____ °F

9. EFFICIENCY OF CONDENSER (SEE INSTRUCTION 4):

%

14. EFFICIENCY OF CONDENSER (SEE INSTRUCTION 4):

%

*ELECTRICAL PRECIPITATOR

1. FLOW DIAGRAM DESIGNATION OF ELECTRICAL PRECIPITATOR:

N/A

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. COLLECTING ELECTRODE AREA PER CONTROL DEVICE:

FT²

AVERAGE OPERATION OF SOURCE

MAXIMUM OPERATION OF SOURCE

5. GAS FLOW RATE:

SCFM

7. GAS FLOW RATE:

SCFM

6. EFFICIENCY OF ELECTRICAL PRECIPITATOR (SEE INSTRUCTION 4):

%

8. EFFICIENCY OF ELECTRICAL PRECIPITATOR (SEE INSTRUCTION 4):

%

SUBMIT THE MANUFACTURER'S SPECIFICATIONS FOR THE ELECTRICAL PRECIPITATOR. REFERENCE THE INFORMATION TO THIS FORM.

* ELECTRICAL PRECIPITATORS VARY GREATLY IN THEIR DESIGN AND IN THEIR COMPLEXITY. THE ITEMS IN THIS SECTION PROVIDE A MINIMUM AMOUNT OF INFORMATION. THE APPLICANT MUST, HOWEVER, SUBMIT WITH THIS APPLICATION THE MANUFACTURER'S SPECIFICATIONS, INCLUDING ANY DRAWINGS, TECHNICAL DOCUMENTS, ETC. IF THE INFORMATION PROVIDED BY THE MANUFACTURER'S SPECIFICATIONS IS INSUFFICIENT FOR FULL AND ACCURATE ANALYSIS, THE AGENCY WILL REQUEST SPECIFIC ADDITIONAL INFORMATION.

FILTER UNIT

1. FLOW DIAGRAM DESIGNATION(S) OF FILTER UNIT:

N/A

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. FILTERING MATERIAL:

5. FILTERING AREA:

6. CLEANING METHOD:

☐ SHAKER☐ REVERSE AIR☐ PULSE AIR☐ PULSE JET☐ OTHER: SPECIFY _____

7. GAS COOLING METHOD:

☐ DUCTWORK:

LENGTH _____ FT., DIAM _____ IN.

☐ BLEED-IN AIR☐ WATER SPRAY☐ OTHER: SPECIFY _____

AVERAGE OPERATION OF SOURCE

MAXIMUM OPERATION OF SOURCE

8. GAS FLOW RATE (FROM SOURCE):

SCFM

12. GAS FLOW RATE (FROM SOURCE):

SCFM

9. GAS COOLING FLOW RATE:

BLEED-IN AIR _____ SCFM, WATER SPRAY _____ GPM

13. GAS COOLING FLOW RATE:

BLEED-IN AIR _____ SCFM, WATER SPRAY _____ GPM

10. INLET GAS CONDITION:

TEMPERATURE _____ °F DEWPOINT _____ °F

14. INLET GAS CONDITION:

TEMPERATURE _____ °F DEWPOINT _____ °F

11. EFFICIENCY OF FILTER UNIT (SEE INSTRUCTION 4):

%

15. EFFICIENCY OF FILTER UNIT (SEE INSTRUCTION 4):

%

SCRUBBER	
1. FLOW DIAGRAM DESIGNATION(S) OF SCRUBBER: N/A	
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:
4. TYPE OF SCRUBBER: <input type="checkbox"/> HIGH ENERGY: GAS STREAM PRESSURE DROP _____ INCH H ₂ O <input type="checkbox"/> PACKED: PACKING TYPE _____, PACKING SIZE _____, PACKED HEIGHT _____ IN. <input type="checkbox"/> SPRAY: NUMBER OF NOZZLES _____, NOZZLE PRESSURE _____ PSIG <input type="checkbox"/> OTHER: SPECIFY _____ ATTACH DESCRIPTION AND SKETCH WITH DIMENSIONS	
5. TYPE OF FLOW: <input type="checkbox"/> COCURRENT <input type="checkbox"/> COUNTERCURRENT <input type="checkbox"/> CROSSFLOW	
6. SCRUBBER GEOMETRY: LENGTH IN DIRECTION OF GAS FLOW _____ IN., CROSS-SECTIONAL AREA _____ SQUARE IN.	
7. CHEMICAL COMPOSITION OF SCRUBBANT:	
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
8. SCRUBBANT FLOW RATE: _____ GPM	12. SCRUBBANT FLOW RATE: _____ GPM
9. GAS FLOW RATE: _____ SCFM	13. GAS FLOW RATE: _____ SCFM
10. INLET GAS TEMPERATURE: _____ °F	14. INLET GAS TEMPERATURE: _____ °F
11. EFFICIENCY OF SCRUBBER (SEE INSTRUCTION 4): _____ % PARTICULATE _____ % GASEOUS	15. EFFICIENCY OF SCRUBBER (SEE INSTRUCTION 4): _____ % PARTICULATE _____ % GASEOUS

OTHER TYPE OF CONTROL EQUIPMENT		
1. FLOW DIAGRAM DESIGNATION(S) OF "OTHER TYPE" OF CONTROL EQUIPMENT: See Figure 2-1 and Appendix A		
2. GENERIC NAME OF "OTHER" EQUIPMENT: Enclosed Flare Station	3. MANUFACTURER:	4. MODEL NAME AND NUMBER:
5. DESCRIPTION AND SKETCH, WITH DIMENSIONS AND FLOW RATES, OF "OTHER" EQUIPMENT: See typical manufacturer's proposal in Appendix B.		
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE	
6. FLOW RATES: _____ GPM 1,000 _____ SCFM	8. FLOW RATES: _____ GPM 1,000 _____ SCFM	
7. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): 98 %	9. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): 98 %	

EMISSION INFORMATION

.. NUMBER OF IDENTICAL CONTROL UNITS OR CONTROL SYSTEMS (DESCRIBE AS REQUIRED):

AVERAGE OPERATION OF SOURCE

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL CONTROL UNIT OR CONTROL SYSTEM		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	2a. GR/SCF	b. Negligible LB/HR	c. AP-42
CARBON MONOXIDE	3a. PPM (VOL)	b. 19.0 LB/HR	c. AP-42, see calculations
NITROGEN OXIDES	4a. PPM (VOL)	b. 2.7 LB/HR	c. AP-42, see calculations
ORGANIC MATERIAL	5a. PPM (VOL)	b. 1.1 LB/HR	c. Massbalance, see calculations
SULFUR DIOXIDE	6a. PPM (VOL)	b. 0.8 LB/HR	c. AP-42, see calculations
OTHER (SPECIFY) Methane	7a. PPM (VOL)	b. 39.9 LB/HR	c. AP-42, see calculations

MAXIMUM OPERATION OF SOURCE

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL CONTROL UNIT OR CONTROL SYSTEM		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	8a. GR/SCF	b. Negligible LB/HR	c. AP-42
CARBON MONOXIDE	9a. PPM (VOL)	b. 19.0 LB/HR	c. AP-42, see calculations
NITROGEN OXIDES	10a. PPM (VOL)	b. 2.7 LB/HR	c. AP-42, see calculations
ORGANIC MATERIAL	11a. PPM (VOL)	b. 1.1 LB/HR	c. Massbalance, see calculations
SULFUR DIOXIDE	12a. PPM (VOL)	b. 0.8 LB/HR	c. AP-42, see calculations
OTHER (SPECIFY) Methane	13a. PPM (VOL)	b. 39.9 LB/HR	c. AP-42, see calculations

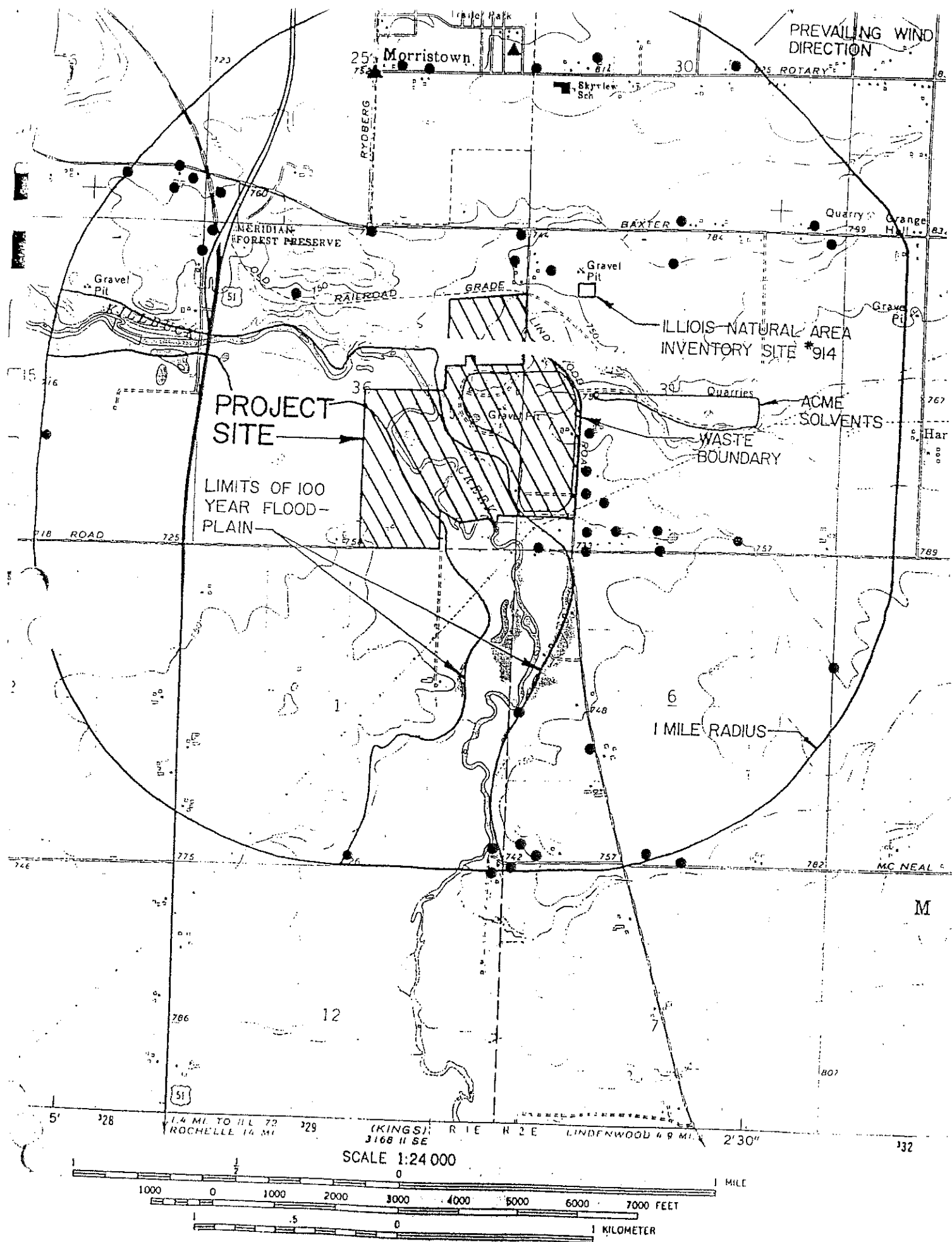
***OTHER** CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

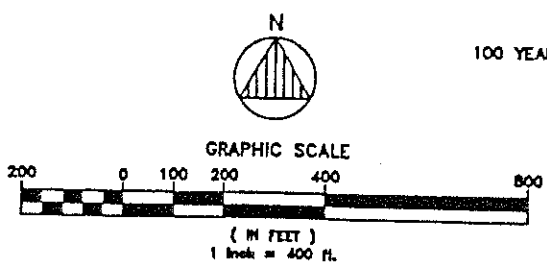
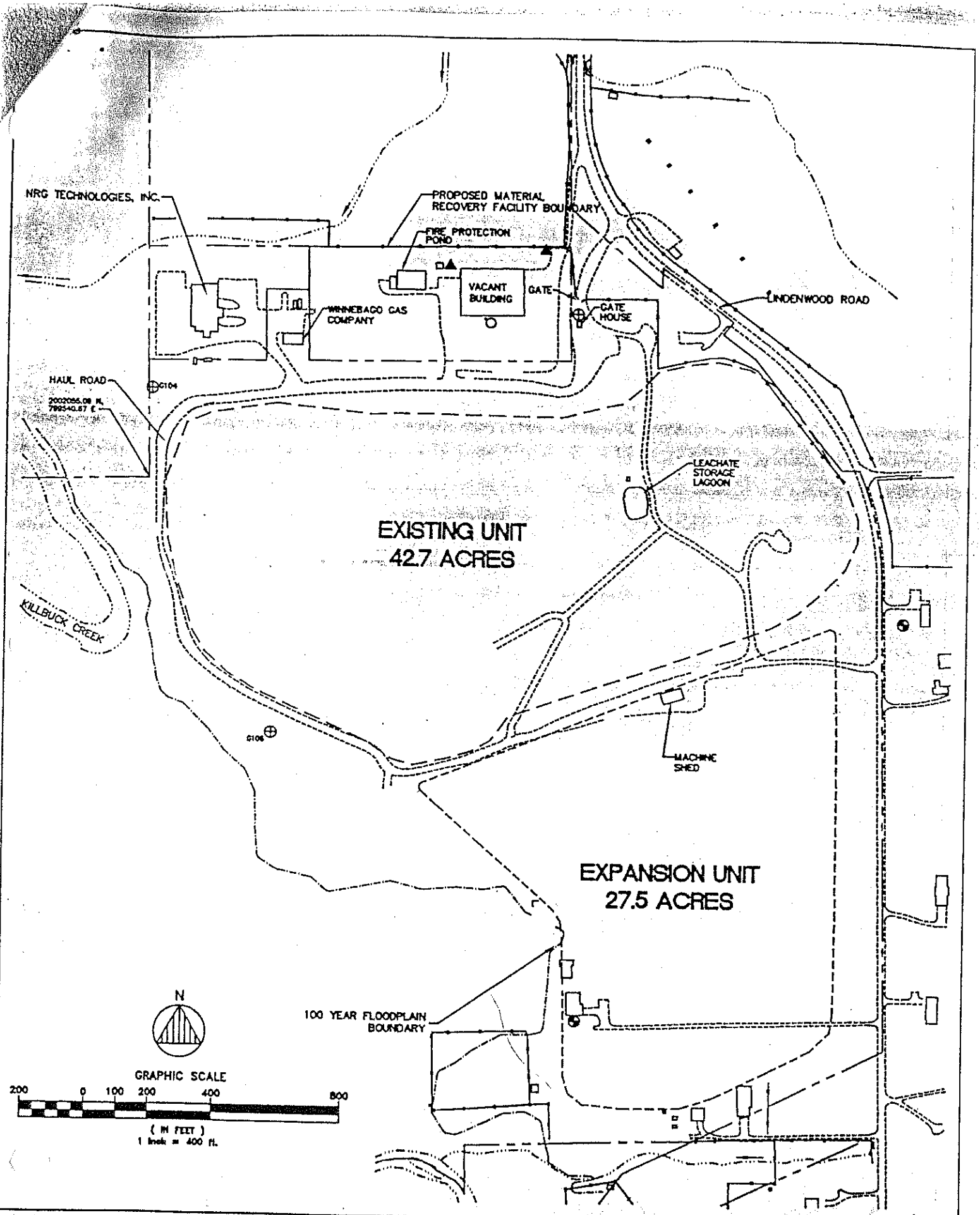
EXHAUST POINT INFORMATION

1. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT: See Figure 2-1	
2. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.): See Figure 1-2, Appendix A, and Appendix B, exhaust is up	
3. EXIT HEIGHT ABOVE GRADE: 34 feet (typical)	4. EXIT DIAMETER: 6.8 feet (approximate)
5. GREATEST HEIGHT OF NEARBY BUILDINGS: 30 feet	6. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: 350 (approximate)
<div style="display: flex; justify-content: space-between;"> <div> AVERAGE OPERATION OF SOURCE 7. EXIT GAS TEMPERATURE: 1,500 (typical) °F GAS FLOW RATE THROUGH EACH EXIT: (1,000 SCFM) 3,700 ACFM </div> <div> MAXIMUM OPERATION OF SOURCE 9. EXIT GAS TEMPERATURE: 1,500 (typical) °F 10. GAS FLOW RATE THROUGH EACH EXIT: (1,000 SCFM) 3,700 ACFM </div> </div>	

APPENDIX D

Above Ground LFG Collection System and Flare Plan Sheet





ANDREWS ENVIRONMENTAL ENGINEERING, INC.
 3535 Mayflower Blvd., Springfield, Illinois
 (217)787-2334 Fax (217)787-9493
 Pontiac, IL • Warrenville, IL • Indianapolis, IN

EXISTING SITE CONDITIONS
 APPLICATION FOR SIGNIFICANT MODIFICATION TO PERMIT FOR
 WINNEBAGO RECLAMATION SERVICE, INC.
 PAGE 1 LANDFILL FACILITY

DATE: MAY 1996
JOB NO.: 90-114
REV. NO.:

SHEET NUMBER:
GAS

APPENDIX E

NSPS Gas Collection & Control System Design Plans

NSPS LANDFILL GAS COLLECTION AND CONTROL SYSTEM CHECKLIST

Information Required in Addition to Existing Air & Solid Waste Permits

Pursuant to 40 CFR 60, Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills, new and existing landfills that have an NMOC emission rate equal to or greater than 50 Mg/year must submit a Landfill Gas Collection and Control System (GCCS) Design Plan or a Construction Permit Application, respectively, unless the owner or operator elected to recalculate the NMOC emission rate after NMOC sampling and analysis (Tier 2 or Tier 3) and the resulting rate is less than 50 Mg/yr. A landfill is considered controlled at the time the design plan or construction permit is submitted. **(WRS - Pagel Landfill existing air permits establish specific controls.)**

1. Does the GCCS plan to collect gas from each area, cell, or group of cells in the landfill in which the initial solid waste has been placed for a period of: 5 years or more for active areas and 2 years or more for closed or areas at final grade? **[§60.752(b)(2)(ii)(A)2]**

If No, describe circumstances _____

2. What is the design life of the GCCS? _____ **[§60.752(b)(2)(v)]**

If less than 15 years describe why: _____

(Note that the period of intended use must be at least 15 years)

3. Does the design plan/construction permit application address the following:

Gas system expandability	Yes	No
Integration with closure end use	Yes	No
Air intrusion control	Yes	No
Corrosion resistance	Yes	No
Fill settlement	Yes	No
Resistance to the refuse decomposition heat	Yes	No

Topographical map of the surface area and proposed <u>surface monitoring route</u> [required in §60.753(d)]	Yes	No
---	-----	----

[§60.752(b)(2)(i)(C)]

4. Is the GCCS designed for the maximum expected flow rates during its life?
[§60.752(b)(2)(ii)(A)(1)] **Attach calculation sheets if applicable**

5. Describe the measures taken to control lateral LFG migration in the design. If no measures were taken, describe why. **[§60.752(b)(2)(ii)(A)(4)]**

6. Is a "Sufficient Density" of gas collection points planned? Refer to Section 5.1 Workshop Manual, and Appendix E, Municipal Solid Waste Landfills, Volume 1₂

[§60.752(b)(2)(ii)(A)(2) (circle applicable rule)]

Review Definition for Sufficient Density and Compliance Procedures in §60.755.

7. Does the plan indicate whether the LFG will be removed at a "Sufficient Extraction Rate", i.e., a rate sufficient to maintain a negative pressure at all wellheads in the collection system without causing air infiltration, including any wellheads connected to the system as a result of expansion

Review Definition for Sufficient Extraction Rate and Compliance Procedures in §60.755.

- \\nw\c:\projects\page\page-air\checklist.doc
Date: January 27, 1999

APPENDIX F

Compliance Monitoring & Response Plan

February 4, 1999

Recycling and
waste disposal

Mr. David Kolaz, manager
Illinois Environmental Protection Agency
Bureau of Air
Compliance and Systems Management Section
1021 North Grand East
Springfield, IL 62794-9276

Re: Pagel Landfill Facility
Facility I.D. 201801AFF

Amended Letter of Understanding and schedule for completion of a Title V Clean Air Act
Permit Application.

4920 Forest
Hills Road
Loves Park
Illinois 61111

Dear David:

In accordance with a phone conversation between Kanchen Patel and myself Winnebago Reclamation Service (WRS) acknowledges that additional reports are required to be submitted before WRS has achieved full compliance with the CAAPP and associated reporting. The following reports will be filed as indicated.

P.O. Box 2071
Loves Park
Illinois 61130

WRS will file an Annual Air Emission report by the May 1, 1999 due date that incorporates emission results for prior years for which a report was due.

WRS will file a permit application requesting approval to construct our Collection and Control system on an ongoing as needed basis. This application will present a Collection and Control System Design Plan per the NSPS requirements.

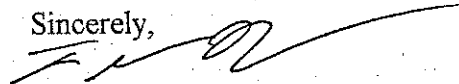
The CAAPP application will contain additional reports associated with the various requirements of the New Source Performance Standards.

815.654.5952
Fax 815.654.4717

I apologize for any misrepresentation of WRSs' compliance status that may have been construed in the letter from WRS dated February 4, 1999. If you have any questions, or would like

additional information please, feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'THILBERT', with a long, sweeping horizontal line extending to the right.

Thomas Hilbert

cc: Kanchen Patel - IEPA-BOA-CMSMS, Springfield, IL
Bob West -- Andrews Engineering, Indianapolis, IN

February 4, 1999

Recycling and
waste disposal

Mr. David Kolaz, manager
Illinois Environmental Protection Agency
Bureau of Air
Compliance and Systems Management Section
1021 North Grand East
Springfield, IL 62794-9276

Re: Pagel Landfill Facility
Facility I.D. 201801AFF

Letter of Understanding and schedule for completion of a Title V Clean Air Act Permit
Application.

Dear David:

4920 Forest
Hills Road
Loves Park
Illinois 61111


Winnebago Reclamation Service (WRS) appreciated meeting with Mr. Mike Davidson, Kanchen Patel, and Richard Jennings on January 28, 1999 to discuss the permit status of the Pagel Landfill Facility. The meeting clarified concerns that WRS had regarding the existing landfill gas processing facilities at our site and on adjacent properties.

Based on our discussions during the meeting it is our intent to file an application for a permit that is consistent with Title V of the Clean Air Act no later than February 28, 1999. It is also our understanding that our current reporting requirements have been met and no additional reports are due at this time.

P.O. Box 2071
Loves Park
Illinois 61130

If you have any questions, or would like additional information please, feel free to contact me.

Sincerely,


Thomas Hilbert

cc: Kanchen Patel - IEPA-BOA-CMSMS, Springfield, IL
Bob West - Andrews Engineering, Indianapolis, IN

815.654.5952
Fax 815.654.4717

MEETING AGENDA

IEPA - WRS PAGEL Landfill

10:00 January 28, 1999
DAPC Conference Room
1021 North Grand Ave. East
Springfield, IL

INTRODUCTIONS

Thomas Hilbert	WRS - Pagel Landfill	815/874-4806
Robert L. West	AEEI - Indianapolis	317/595-6492

OBJECTIVES

- Complete CAAPP application according to schedule arranged during meeting.
- Coordination for submittal of the existing upgraded gas collection and control plans for both the IEPA - Bureau of Air and IEPA - DLPC to satisfy 40 CFR 60.750 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills (NSPS)
- Reserve the option of recalculating NMOC emissions according to Tier 2 or Tier 3, in the event that these analyses may result in reduced monitoring or reporting requirements.

TITLE V PERMIT APPROACH

- Construction and Operating permits have been approved by both IEPA Bureau of Land and IEPA - DLPC for equipment expected to satisfy the Municipal Solid Waste Landfill NSPS/EG requirements.
- The Title V Application will incorporate the existing "federally enforceable" controls into the design, using the latest guidance and appropriate site specific information or AP-42 emission factors to establish the basis for Title V Potential to Emit (PTE).
- **The 1996 Expansion will also be incorporated into Title V application.**

Gas System Design Plan

- The gas collection and control system plans provided in approved IEPA - DLPC permit applications are being upgraded to fulfill the criteria of the MSW Landfill NSPS.
- The schedule of control and reporting requirements will be implemented as established in applicable NSPS/EG regulations.

CONCLUSIONS

Deliverables & Schedule

It is our understanding that recent amendments to Federal regulations and guidance documents issued by U.S.EPA have clarified issues of uncertainty regarding implementation of the Title V permit program and associated air pollution control / reporting requirements for municipal solid waste landfills.

Based on recently revised AP-42 emission factor parameters, many of our facilities, using the most conservative estimates, fall well below major source thresholds for Title V criteria pollutants, landfill gas NMOCs, and HAPs. These facilities are typically subject to Part 70 (Title V) permitting based on New Source Performance Standards (NSPS/EG), 40 CFR 60.750, Subpart WWW, or 40 CFR 60.30c, Subpart Cc. Unless otherwise subject, Part 70 applicability for Municipal Solid Waste Landfills (MSWLs) is not based upon potential emissions of air pollutants, but rather on the size of each facility. These landfills are being subject to Part 70 permits based upon maximum capacity scenarios which typically do not occur until closure.

Permit History

Winnebago Reclamation Service, Inc. (WRS) - Pagel Landfill received an initial *Joint Construction and Operation Permit* - Application No.: 94070003 for a Flare Station (FLARE-WRS) dated August 22, 1995. The permit notes that the landfill may be subject to proposed Emission Guidelines (EG) from existing landfills (56 FR 24468, May 30, 1991). A copy of the application was included in a submittal to IEPA Division of Land Pollution Control (DLPC) entitled "*Application for Significant Modification to Permit for an Existing Unit*" on July 10, 1995, Log 1995-250.

WRS - Pagel Landfill updated the July, 1995 DLPC application, submitting to IEPA-DLPC an "*Application for Significant Modification to Permit for an Existing Unit*" - IEPA Site No. 2018080001, May, 1996. Specific changes to the gas system piping design were intended to account for the NSPS/EG requirements.

NRG Technologies, Inc., is a secondary user for the landfill gas generated at Pagel Landfill and is located on contiguous property. For the purposes of CAAPP, it may be useful (or necessary??) to incorporate the sludge dryer facilities emissions unit(s) into a single permit with the landfill source. Note: IEPA has indicated that reporting for the NSPS/EG is expected to be the landfill's responsibility. NRG received approval August 26, 1996 to operate the Rotary Drum Dehydrator, Application No: 84110018.

Air construction and operating permits were modified February 4, 1997 through Application No.: 97010035, FLARE-WRS to specify an enclosed flare system. The permitted flare system is a typical air pollution control device capable of 98% combustion efficiency, consistent with the Municipal Solid Waste Landfill NSPS/EG requirements.

- It does not appear that the 1996 Expansion Land Pollution Sig. Mod. Application waste volumes have been included in any of the Air Permits.

- Did the Initial Design Capacity Report include the '96 Waste Volumes?

References:

AP-42, Supplement D, Section 2.4 Municipal Solid Waste Landfills, 8/98, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, North Carolina.

Municipal Solid Waste Landfill New Source Performance Standards (NSPS) and Emission Guidelines (EG) – Questions and Answers, Revised November 1998, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, North Carolina.

Memorandum - Periodic Monitoring Guidance for Title V Operating Permits Programs, September, 1998, U.S. Environmental Protection Agency, Office of Regulatory Enforcement & Office of Air Quality Planning and Standards, Research Triangle Park, North Carolina.

Municipal Solid Waste Landfills, Volumes 1 & 2: Summary of the Requirements for the New Source Performance Standards and Emission Guidelines for Municipal Solid Waste Landfills, EPA-453R/96-004, September 1998 & *Summary of the Requirements for Section 111(d) State Plans for Implementing the Municipal Solid Waste Landfills Emission Guidelines*, EPA-456R/98-009, November 1998, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency; Research Triangle Park, North Carolina;.

Municipal Solid Waste Landfill Gas Design Plan Review Student Manual – APTI Workshop T018, 1st Edition North Carolina State University, 1998, EMCON, Kiel, Wisconsin

MED\med\C:\EPA2139\FILEROOM\LANDFILL\checklist.doc

Date: November 10, 1998

217/782-2113

Data and Information Requirements for Data and Information Requirements for Municipal Solid Waste Landfills

January 19, 1999

IEPA -- Bureau of Air (BOA) permits may be needed for construction and operation of certain existing, new and modified municipal solid waste (MSW) landfills since landfills are potential sources of nonmethane organic compounds (NMOC) emissions. The IEPA and the Illinois EPA have promulgated regulations that cover the operation of certain MSW landfills and the capture and control of gaseous emissions from the landfill (i.e., the New Source Performance Standards (NSPS) (40 CFR 60 Subpart WWW) and the Emission Guidelines (40 CFR 60 Subpart GG) for Municipal Solid Waste Landfills adopted by USEPA on March 12, 1996 [61 Fed. Reg. 9205 et seq.], and the Illinois air regulation covering nonmethane organic compound (NMOC), 35 Ill. Adm. Code Part 220 (effective July 31, 1998).

Therefore, state air pollution control construction and operating permits for modifications (i.e., expansion or increases in capacity) of an existing landfill or construction of a new MSW landfill are required. In addition, certain existing and new MSW landfills may be subject to the Illinois EPA's Clean Air Act Permitting Program (CAAPP) pursuant to the referenced NSPS and EG. Moreover, increases in overall landfill emissions of designated pollutants (i.e., CO, TSP, PM₁₀, NO_x, SO₂, VOM, NMOC, ...etc.) may subject major facilities to regulations covering new source review (35 Ill. Adm. Code Part 203) and or the federal regulations covering the prevention of significant deterioration of air quality (40 CFR 52.21).

STATE PERMIT APPLICATIONS

Pursuant to Ill. Adm. Code Sections 201.142 and 201.143, Division of Air Pollution Control permits are required prior to the construction and operation of control equipment (i.e., flares or electrical generating stations) or process emission sources (i.e., landfills). A Joint Construction And Operating permit can be applied for simultaneously by checking both boxes at the top of the "Application for Permit" (APC-200) form. Normally the operating permit will expire on a date specified in the permit. Renewal applications for an operating permit must be received 90 days prior to the expiration date.

CAAPP (Title V) PERMIT APPLICATIONS

Pursuant to Section 39.5 of the Illinois Environmental Protection Act and the landfill NSPS and EG, affected landfills and their ancillary emission units are subject to the applicable Clean Air Act permitting requirements. Affected MSW landfills are all landfills that have a design capacity in excess of 2.5 million cubic meters and 2.5 million megagrams. These emission sources may apply for a CAAPP permit under the time frames shown in the respective regulation. For example:

1. MSW landfills initially subject to the NSPS were required to file prior to June 12, 1997. This requirement affects those existing and new landfills that either under went an expansion (modification) or construction after May 30, 1991 but prior to March 12, 1996. [40 CFR 60.752(c)]

2. New or modified MSW landfills, which subsequently become subject to the NSPS, are required to file within 90 days of becoming affected. This requirement affects those existing and new landfills that either under went an expansion (modification) or construction after March 12, 1996. [40 CFR 60.752(c)]
3. MSW landfills subject to 35 Ill. Adm. Code Part 220 are required to file prior to October 29, 1999. This requirement affects those existing landfills that have been in operation since November 8, 1987 and which have not been modified. These landfills are assumed to be subject 12 months after the filing of the NMOC emission report required under 35 Ill. Adm. Code 220.280(b).

THE APPLICATION

In the case of the state permits application it is advisable to review the information requirements of 35 Ill. Adm. Code Sections 201.152 (Contents of Application for Construction Permit) and 201.157 (Contents of Application for Operating Permit). For CAAPP applications the information requirements of Section 39.5(5) of the Illinois Environmental Protection Act should be reviewed. In addition, the "General Instructions for CAAPP Applications" (202-CAAPP) and other applicable CAAPP form instructions can also be used to as guides in preparing the CAAPP applications.

Depending upon specific project considerations and the equipment used, the following forms may be used as guides in supplying the information required for the application.

State Forms	CAAPP Forms	Description
APC-200	200-CAAPP	"Application for permit" or APPLICATION FOR CAAPP PERMIT* This form identifies the owner of the emission sources and control equipment, the operator of the equipment, and the location of the equipment. Only a person with signature authority should sign the application.
APC-220	220-CAAPP	"Process Emission Source" or PROCESS EMISSION UNIT This form is for any emission unit that is part of the process. In this case the landfill is the process emission unit.
APC-232	232-CAAPP	"Tank Addendum" or STORAGE TANK. Unless it is determined to be exempt from the permitting requirements under 35 Ill. Adm. Code Sections 201.146 or if the emission unit is determined to be insignificant under 35 Ill. Adm. Code 201.211, Any storage tank having a capacity of greater than 5000 gallons and storing organic material (i.e., fuels, leachate...etc.). In addition, any tank used to dispense gasoline are required to be covered under both the State and a CAAPP permitting programs.
APC-260	260-CAAPP	AIR POLLUTION CONTROL EQUIPMENT This form is for any emissions that are vented to, and thereby reduced by a piece of equipment. Examples include flares, afterburners, and electrical generating units fired by landfill gas. Note that the 260-CAAPP has various addendum's that can be used as guides in supplying information regarding a specific control device (i.e., flares, afterburners,...etc.). The 270-CAAPP form (STATIONARY INTERNAL COMBUSTION ENGINE OR TURBINE) can be used as an addendum for electrical generating units.

Other information that is required in the CAAPP application includes the information shown on the following forms:

391-CAAPP	Fugitive Emissions.
215-CAAPP	Hazardous Air Pollutant Emission Summary.
293-CAAPP	Compliance Plan/Schedule Of Compliance For CAAPP Permit.
294-CAAPP	Compliance Plan/Schedule Of Compliance-Addendum For Noncompliant Emission Units, If Applicable.
296-CAAPP	Compliance Certification.
292-CAAPP	Fee Determination For CAAPP Permit

In addition to the information shown on the forms, the following additional information may be required:

1. Process flow diagram,
2. Plot plan/map of the landfill
3. Plot plan/map of the immediate area showing distances to nearest residence, hospitals, schools,...etc.,
4. An indication as to whether the facility is a municipal solid waste landfill or co-disposal facility.
5. A description of any current or potential odor problems or odor current mitigation strategies currently in place.
6. A description of any areas that may contain asbestos, if applicable, and the procedures the landfill uses to demonstrate compliance with the requirements of 40 CFR 61 Subpart M - National Emission Standard for Asbestos.
7. A description of the landfills operation including the startup date for the landfill, amount of waste in place; the projected waste acceptance rate; the projected closure date; design capacity of the landfill;...etc.
8. A description of all operations that may be associated with the control of emissions or landfill operations (i.e., landfill gas to energy or control facilities operated another company or corporation, closed facilities that are adjacent or congruent to the landfill,...etc.)
9. A discussion, as applicable, concerning when the landfill began operation, underwent expansion or modification, and or when the landfill stopped accepting waste or under went closure.
10. Landfill gas, nonmethane organic compound (NMOC), and other pollutant emissions
11. Applicable DLPC or DWPC contact person(s).

Questions regarding air pollution permits may be addressed to the Division of Air Pollution Control Permit Section (217/782-2113).



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276

Mary A. Gade, Director

217/782-5811
TDD 217/782-9143

January 19, 1999

Gary L. Marzorati
Winnebago Reclamation Service
4920 Forest Hill Road
Loves Park, IL 61111

CERTIFIED MAIL # P 344 332 729
RETURN RECEIPT REQUESTED

RE: Non-Compliance Advisory
Facility I.D. 201801AAF
Winnebago Reclamation Service, Winnebago Reclamation Landfill
Facility Location: 8403 Lindenwood Road, Rockford, IL 61109

Dear Mr. Marzorati:

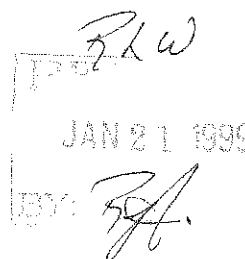
The Illinois Environmental Protection Agency ("Illinois EPA") has received the response from Andrews Environmental Engineering Inc., a consulting firm representing Winnebago Reclamation Service, dated January 7, 1999, in response to the Non-Compliance Advisory dated December 9, 1998. As requested, the Illinois EPA has scheduled a meeting to discuss a draft CAAPP permit application and other issues related to the Municipal Solid Waste Landfill. The meeting will be held on January 28, 1999, at 10:00 AM, in the DAPC Conference Room, 1021 North Grand Avenue East, Springfield, Illinois.

This letter does not constitute a waiver or modification of the terms and conditions of any license or permit issued by the Illinois EPA or any other unit or department of local, state or federal government, or of any local, state, or federal statute or regulatory requirement.

Any questions regarding this matter should be directed to KANCHAN PATEL at 217/782-5811.

Sincerely,

David J. Kolaz, Manager
Compliance and Systems Management Section
Bureau of Air



DJK: KP

cc: FOS Peoria Regional Office
Permits Section
Robert L. West, Andrews Environmental Engineering Inc., 5987 E. 71st St., Suite 207,
Indianapolis, Indiana 46220



ANDREWS ENVIRONMENTAL ENGINEERING INC.

5987 East 71st Street, Suite 207, Indianapolis, Indiana 46220 (317) 595-6492 Fax (317) 598-9929

January 7, 1999

Mr. Kanchan Patel
Illinois EPA, Bureau of Air
Compliance Unit
P.O. Box 19276
Springfield, IL 62794-9276

re: Response to Non-Compliance Advisory
Facility I.D. 201801AAF
Winnebago Reclamation Service, Pagel Landfill
Facility Location: 8403 Lindenwood Road

Dear Mr. Patel:

Winnebago Reclamation Service, Inc. (WRS) - Pagel Landfill is taking steps outlined below to address Attachment A of the IEPA - Bureau of Air Non-Compliance Advisory, dated December 9, 1998. The Non-Compliance Advisory is associated with 40 CFR 60.750 (Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills (NSPS)).

1. Andrews Environmental Engineering, Inc. (AEEI) has been retained to complete the CAAPP permit application for submittal to IEPA, according to the following schedule:

- a. Through this correspondence, initiate arrangements for a meeting in Springfield, IL, to discuss a draft CAAPP application with IEPA - Bureau of Air.

A meeting is requested for January or early February 1999.

- b. Complete CAAPP application according to schedule arranged during meeting.

Note: One issue for this meeting will be timing and coordination for submittal of the existing or revised gas collection and control plans for both the IEPA - Bureau of Air and IEPA - DLPC.

2. The initial design capacity report - submitted June 10, 1996, estimates NMOC emissions above the 50 Mg/yr threshold, establishing control requirements according to the Municipal Solid Waste Landfill NSPS/EG. Construction and Operating permits have been approved by both IEPA Bureau of Land and IEPA - DLPC for equipment expected to satisfy the Municipal Solid Waste Landfill

NSPS/EG requirements. The schedule of control and reporting requirements will be implemented as established in applicable NSPS/EG regulations.

- Annual Tier 1 NMOC emission calculations for the years 1996 through 1998 are provided, as enclosed.
- The gas collection and control system plans provided in approved IEPA - DLPC permit applications are being reviewed and updated (as needed) to fulfill the criteria of the Municipal Solid Waste Landfill NSPS/EG. Any additional plans will be submitted to IEPA according to a schedule coordinated with the draft CAAPP permit application.

Notes: WRS - Pagel Landfill would like to reserve the option of recalculating NMOC emissions according to Tier 2 or Tier 3, in the event that these analyses may result in reduced monitoring or reporting requirements. It should also be noted that site specific analyses and recent rule changes or clarifications associated with implementation of the NSPS/EG may affect the major source status referenced in Attachment A, #1.

If you should have any questions about our response to the Non-Compliance Advisory, please contact Tom Hilbert (815/874-4806) or myself.

Sincerely,



Robert L. West
Environmental Engineer

cc: Thomas Hilbert - WRS

enclosures

1996 - 1998 NMOC Emission Rate Report for NSPS

PAGEL LANDFILL
1996-1998 NONMETHANE ORGANIC
COMPOUNDS EMISSION RATE REPORT FOR
NEW SOURCE PERFORMANCE STANDARDS

Prepared for
Winnebago Reclamation Service, Inc.
Winnebago County, Illinois

January 7, 1999

APPENDIX C

IN-PLACE WASTE CALCULATIONS

Source: *"Application for Significant Modification to Permit for an Existing Unit" - IEPA*

Site No. 2018080001, May, 1996, Log. 1995-250, Vol. II of II, Attachment 23

PAGEL LANDFILL
1996-1998 NONMETHANE ORGANIC
COMPOUNDS EMISSION RATE REPORT FOR
NEW SOURCE PERFORMANCE STANDARDS

INTRODUCTION

Pursuant to 40 CFR 60.752-- New Source Performance Standards (NSPS) for municipal solid waste landfills (MSWLFs) -- any landfill with a design capacity greater than 2,500,000 m³ and 2,500,000 Mg must submit annual nonmethane organic compound (NMOC) emission rate report(s). Furthermore, those landfills which demonstrate an annual NMOC emission rate greater than 50 Mg/yr are required to either recalculate the NMOC emission rate using a site-specific NMOC concentration or submit plans for a gas collection system.

DESIGN CAPACITY

The waste design capacity for Winnebago Reclamation Service, Inc. (WRS) - Pagel Landfill was taken from the document submitted to IEPA June 10, 1996, *"Initial Design Capacity and Nonmethane Organic Compounds Emission Rate Reports"* (IDCR), see Appendix A. The resulting design capacity for the facility was determined to be 8,530,000 cy (6,522,000 m³ and 4,645,000 Mg); therefore, WRS - Pagel Landfill is required to submit annual NMOC emission rate report(s). It has been somewhat unclear whether one report with conservative assumptions may cover several years, or if separate reports are required annually.

NMOC EMISSION RATE

The annual NMOC emission rates for the facility was determined by use of U.S. EPA's *Landfill Gas Emissions Model, version 2.01*. This model uses standard defaults for equations found in 40 CFR 60.754, together with annual solid waste acceptance rates (Appendix B), to calculate annual NMOC emissions from MSWLFs.

Pagel Landfill began accepting waste in 1972 and has provided annual waste mass acceptance rates for 1995 -1998, see Appendix B. Records of waste placement prior to 1995 were not available for this analysis. However, volume calculations from the IEPA - Department of Land Pollution Control (DLPC) "*Application for Significant Modification to Permit for an Existing Unit*" - IEPA Site No. 2018080001, May, 1996, Log. 1995-250, Vol. II of II, Attachment 23 were used to determine the total amount of in-place waste, see Appendix C. For the end of 1995, the remaining refuse capacity is estimated at 1,442,200 cy. At the end of 1995 (or beginning of 1996), the total net volume of in-place waste for the "existing unit" was determined to be 2,794,680 tons, see Appendix C.

In order to determine the average annual acceptance rate prior to 1995, the total waste in-place through 1995 was divided evenly for the years 1972 thru 1994. The average annual acceptance rates for 1972-1994 were found to be 109,846 tons/yr (99,650 Mg/yr), see Appendix C. The annual waste acceptance rates were used in the estimation model.

Results of the emissions estimation model (Appendix D) indicate that for the years ending 1996 through 1998, NMOC emission rates are between 430 Mg/yr and 520 Mg/yr. These values are above the maximum emission rate of 50 Mg/yr NMOC. Therefore, according to the NSPS regulations, Pagel Landfill is required to either recalculate the NMOC emission rate using a site-specific NMOC concentration, or

submit plans for a gas collection system within one year of submittal of this design
capacity report. *11/10/98* *1/10/99*

Illinois EPA air pollution control permits are currently active for the gas collection system and associated equipment. The permitted equipment has been installed and is currently either being utilized, or undergoing maintenance or improvements.

APPENDIX A

INITIAL DESIGN CAPACITY REPORT - Calculations

INITIAL DESIGN CAPACITY CALCULATIONS

Winnebago Reclamation Service, Inc. Rockford, Illinois

1. **Airspace calculations:** The total airspace and plan area of the existing unit and the expansion unit at the site were calculated using AutoCAD release 12 and Softdesk AdCadd Civil version 12.0. The results of these calculations are detailed below.

	<u>Existing Unit</u>	<u>Expansion Unit</u>
Total airspace (yd ³):	6,100,000	2,430,000
Plan area (ac):	42.7	27.5

2. **Average depth of solid waste:** The average depth of solid waste was calculated by dividing the total airspace by the plan area.

Existing Unit:

$$d = [6,100,000 \text{ yd}^3 \div 27 \text{ ft}^3/\text{yd}^3] \div [42.7 \text{ ac} \div 43,560 \text{ ft}^2/\text{ac}] = 88.5 \text{ ft}$$

Expansion unit:

$$d = [2,430,000 \text{ yd}^3 \div 27 \text{ ft}^3/\text{yd}^3] \div [27.5 \text{ ac} \div 43,560 \text{ ft}^2/\text{ac}] = 54.8 \text{ ft}$$

3. **Average solid waste acceptance rate:** For the existing unit, the average solid waste acceptance rate was calculated by dividing the total airspace by the number of years the facility is expected to be operational. Since the existing unit first received waste in 1972 and is expected to close early in the year 2001, the site's expected operating life is 29 years. The average solid waste acceptance rate for the expansion unit, which is still in the developmental stage, was assumed to be equal to that calculated for the existing unit. Please note that the compaction density as calculated in Item 4 was used to convert from total cubic yards to tons.

$$R = [6,100,000 \text{ yd}^3] \div 29 \text{ years} = 210,345 \text{ yd}^3/\text{yr}$$

$$= 210,345 \text{ yd}^3/\text{yr} \div 1200 \text{ lb/yd}^3 \div 0.0005 \text{ ton/lb} = 126,200 \text{ tons/yr}$$

4. **Compaction density:** The compaction density of 1200 lb/yd³ was calculated assuming that the gate density of municipal solid waste is 600 lb/yd³ and that a 2:1 compaction ratio will be achieved. Converted to metric units, this value is equivalent to 0.712 Mg/m³.
5. **Design Capacity:** The design capacity of the site was determined by summing the total airspace for the existing and expansion units. Total airspace was converted from cubic yards to cubic meters by multiplying by a conversion factor of 0.7646, and from tons to megagrams by multiplying by a conversion factor of 0.9078. The results of these calculations are detailed below.

	<u>Existing Unit</u>	<u>Expansion Unit</u>	<u>Total Facility</u>
Total Airspace (m ³):	4,664,000	1,858,000	6,522,000
Design Capacity (Mg):	3,322,000	1,323,000	4,645,000

APPENDIX D

LANDFILL GAS EMISSIONS MODEL OUTPUT



ANDREWS ENVIRONMENTAL ENGINEERING, INC.

5987 East 71st Street, Suite 207, Indianapolis, IN 46222
ph (317)595-6492 fx (317)598-9929

Sheet 1 of

By EDP Date 11/7/99

Ckd Date

Project Pagel Landfill

Project No. 90-114 0003

Determine annual acceptance rate for years prior to 1995

Total waste capacity of existing unit = 6,100,000 cy (from Initial Design Capacity Report)

Remaining waste capacity at end of 1995 = 1,442,200 cy (from S.F. Mod. App., May 1996)

$$\begin{array}{r} 6,100,000 \text{ cy} \\ - 1,442,200 \text{ cy} \\ \hline \text{Waste in-place through end of 1995} = 4,657,800 \text{ cy} \end{array}$$

Assume in-place density = 1200 lb/cy

$$\begin{aligned} \text{Waste in-place through end of 1995} &= (4,657,800 \text{ cy}) \left(\frac{1200 \text{ lb}}{\text{cy}} \right) \left(\frac{1 \text{ ton}}{2000 \text{ lb}} \right) \\ &= 2,794,680 \text{ tons} \end{aligned}$$

1995 acceptance rate = 268,231.62 tons (from S.H. records)

$$\begin{aligned} \text{Therefore, in-place waste for 1972-1994} &= 2,794,680 \text{ tons} - 268,231.62 \text{ tons} \\ &= 2,526,448.38 \text{ tons} \end{aligned}$$

Average annual acceptance rate for 1972-1994 (23 years):

$$\begin{aligned} \frac{2,526,448.38 \text{ tons}}{23 \text{ years}} &= 109,845.58 \frac{\text{tons}}{\text{yr}} \\ &= 99,650.24 \text{ Mgyr} \end{aligned}$$

SITE CAPACITY AND OPERATING LIFE CALCULATIONS

Given:

1. All volume calculations are based on the final grades depicted on Sheet B-3 of the site developmental drawings.
2. All volumes calculations represent total airspace. Final cover and daily/intermediate cover are not taken into account.
2. All volume calculations were performed using AutoCAD Release 13 v. C4 and Softdesk Earthworks Release 7, Average End method. The volumes reported are the average of two calculations, one using east-west sections and one using north-south sections, rounded to the nearest hundred cubic yards. The grid method was also used to verify the results.

Calculations:

Volume 1

The total increase in airspace for the final grades permitted under 35 IAC 807 to the proposed final grades depicted on Sheet B-3 was calculated. The final grades permitted under 35 IAC 807 are depicted in Figure 1.

Total Airspace: 1,629,000 c.y.

Volume 2

The total remaining airspace as of November, 1995 was calculated using the existing topography on Sheet B-1 and the proposed final grades depicted on Sheet B-3.

Total Airspace: 1,818,700 c.y.

Site Life

The site life was calculated using the remaining airspace and assuming a waste acceptance rate of 575 tons per day. The average density of as-received waste was assumed to be 600 lb/c.y. The final cover volume calculations are detailed in Attachment 21 (Clay Soil Availability Calculations) and the daily/intermediate cover volume was assumed to be 5% of the remaining airspace minus the final cover volume.

Remaining Airspace (as of November, 1995):	1,818,700 c.y.
Final Cover Volume:	300,600 c.y.
Daily Cover Volume	<u>75,900 c.y.</u>

Total Refuse Capacity: 1,442,200 c.y.

Operating Days per Year	286 days
Gate Refuse Received per Day	1,917 c.y.
Gate Refuse Received per Year	548,167 c.y.
Airspace Consumed per Year	274,083 c.y.
(in-place, assume 2:1 compaction ratio)	

Site Life (as of November, 1995): $1,442,000 \div 274,083 =$ 5.3 years

Therefore, the unit has a remaining site life of less than 5.3 years and will stop accepting refuse near the early in the year 2001. Closure will continue throughout the year 2001.

**Pagel Landfill
Annual Waste Acceptance Rates**

Year	Refuse Acceptance Rate (tons)	Refuse Acceptance Rate (Mg)	Cumulative Total Refuse In-place (Mg)
1972	109,846	99,650	0
1973	109,846	99,650	99,650
1974	109,846	99,650	199,300
1975	109,846	99,650	298,951
1976	109,846	99,650	398,601
1977	109,846	99,650	498,251
1978	109,846	99,650	597,901
1979	109,846	99,650	697,552
1980	109,846	99,650	797,202
1981	109,846	99,650	896,852
1982	109,846	99,650	996,502
1983	109,846	99,650	1,096,153
1984	109,846	99,650	1,195,803
1985	109,846	99,650	1,295,453
1986	109,846	99,650	1,395,103
1987	109,846	99,650	1,494,754
1988	109,846	99,650	1,594,404
1989	109,846	99,650	1,694,054
1990	109,846	99,650	1,793,704
1991	109,846	99,650	1,893,354
1992	109,846	99,650	1,993,005
1993	109,846	99,650	2,092,655
1994	109,846	99,650	2,192,305
1995	268,232	243,336	2,291,955
1996	291,102	264,083	2,535,291
1997	303,960	275,748	2,799,374
1998	292,060	264,952	3,075,123
1999	N/A	#VALUE!	3,340,075

1. Acceptance rates for 1972-1994 are averaged, based on total existing unit waste capacity of 3,322,000 Mg less both waste accepted in 1995 and remaining existing unit volume at the end of 1995 (from May 1996 Sig. Mod. Application, Vol. II of II, Attachment 23).
2. Site design waste capacities (including both existing and expansion units) of 3,322,000 and 4,645,000 Mg (Total) are from Initial Design Capacity Report, 6-10-96 (IDCP).
3. Waste acceptance rates for 1995-1998 were taken from information provided by WRS - Pagel Landfill, 1-05-99.

APPENDIX B

ANNUAL WASTE ACCEPTANCE RATES

1995 - 1998 ANNUAL TONNAGE SUMMARY

PAGEL LANDFILL
1996-1998 NONMETHANE ORGANIC
COMPOUNDS EMISSION RATE REPORT FOR
NEW SOURCE PERFORMANCE STANDARDS

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APPENDICES

APPENDIX A	INITIAL DESIGN CAPACITY REPORT - Calculations
APPENDIX B	ANNUAL WASTE ACCEPTANCE RATES
APPENDIX C	IN-PLACE WASTE CALCULATIONS
APPENDIX D	<i>LANDFILL GAS EMISSIONS MODEL OUTPUT</i>

LANDFILL OPERATIONS
TONNAGE SUMMARY

	<u>1998</u>	<u>1997</u>	<u>1996</u>	<u>1995</u>
PAGEL	292,060.11	303,960.17	281,102.15	268,231.82

Source: C:\PROJECTS\PAGELL-1\1999RPT.PRM

=====
Model Parameters
=====

Lo : 170.00 m³ / Mg
k : 0.0500 1/yr
NMOC : 4000.00 ppmv
Methane : 50.0000 % volume
Carbon Dioxide : 50.0000 % volume

=====
Landfill Parameters
=====

Landfill type : No Co-Disposal
Year Opened : 1972 Current Year : 1999 Closure Year:
Capacity : 4645000 Mg
Average Acceptance Rate Required from
Current Year to Closure Year : 260984.99 Mg/year

=====
Model Results
=====

Year	Refuse In Place (Mg)	NMOC Emission Rate	
		(Mg/yr)	(Cubic m/yr)
1973	9.965E+04	2.429E+01	6.776E+03
1974	1.993E+05	4.739E+01	1.322E+04
1975	2.990E+05	6.937E+01	1.935E+04
1976	3.986E+05	9.028E+01	2.519E+04
1977	4.983E+05	1.102E+02	3.073E+04
1978	5.979E+05	1.291E+02	3.601E+04
1979	6.976E+05	1.471E+02	4.103E+04
1980	7.972E+05	1.642E+02	4.581E+04
1981	8.969E+05	1.805E+02	5.035E+04
1982	9.965E+05	1.960E+02	5.467E+04
1983	1.096E+06	2.107E+02	5.878E+04
1984	1.196E+06	2.247E+02	6.269E+04
1985	1.295E+06	2.380E+02	6.641E+04
1986	1.395E+06	2.507E+02	6.994E+04
1987	1.495E+06	2.628E+02	7.331E+04
1988	1.594E+06	2.742E+02	7.651E+04
1989	1.694E+06	2.852E+02	7.956E+04
1990	1.794E+06	2.955E+02	8.245E+04
1991	1.893E+06	3.054E+02	8.521E+04
1992	1.993E+06	3.148E+02	8.783E+04
1993	2.093E+06	3.237E+02	9.032E+04
1994	2.192E+06	3.322E+02	9.269E+04
1995	2.292E+06	3.403E+02	9.495E+04
1996	2.535E+06	3.830E+02	1.069E+05
1997	2.799E+06	4.287E+02	1.196E+05
1998	3.075E+06	4.750E+02	1.325E+05
1999	3.340E+06	5.164E+02	1.441E+05

Source: C:\PROJECTS\PAGELL~1\1998RPT.PRM

=====
Model Parameters
=====

Lo : 170.00 m³ / Mg
k : 0.0500 1/yr
NMOC : 4000.00 ppmv
Methane : 50.0000 % volume
Carbon Dioxide : 50.0000 % volume

=====
Landfill Parameters
=====

Landfill type : No Co-Disposal
Year Opened : 1972 Current Year : 1998 Closure Year:
Capacity : 4645000 Mg
Average Acceptance Rate Required from
Current Year to Closure Year : 261646.23 Mg/year

=====
Model Results
=====

Year	Refuse In Place (Mg)	NMOC Emission Rate	
		(Mg/yr)	(Cubic m/yr)
1973	9.965E+04	2.429E+01	6.776E+03
1974	1.993E+05	4.739E+01	1.322E+04
1975	2.990E+05	6.937E+01	1.935E+04
1976	3.986E+05	9.028E+01	2.519E+04
1977	4.983E+05	1.102E+02	3.073E+04
1978	5.979E+05	1.291E+02	3.601E+04
1979	6.976E+05	1.471E+02	4.103E+04
1980	7.972E+05	1.642E+02	4.581E+04
1981	8.969E+05	1.805E+02	5.035E+04
1982	9.965E+05	1.960E+02	5.467E+04
1983	1.096E+06	2.107E+02	5.878E+04
1984	1.196E+06	2.247E+02	6.269E+04
1985	1.295E+06	2.380E+02	6.641E+04
1986	1.395E+06	2.507E+02	6.994E+04
1987	1.495E+06	2.628E+02	7.331E+04
1988	1.594E+06	2.742E+02	7.651E+04
1989	1.694E+06	2.852E+02	7.956E+04
1990	1.794E+06	2.955E+02	8.245E+04
1991	1.893E+06	3.054E+02	8.521E+04
1992	1.993E+06	3.148E+02	8.783E+04
1993	2.093E+06	3.237E+02	9.032E+04
1994	2.192E+06	3.322E+02	9.269E+04
1995	2.292E+06	3.403E+02	9.495E+04
1996	2.535E+06	3.830E+02	1.069E+05
1997	2.799E+06	4.287E+02	1.196E+05
1998	3.075E+06	4.750E+02	1.325E+05

Source: C:\PROJECTS\PAGELL~1\1997RPT.PRM

Model Parameters

Lo : 170.00 m³ / Mg
k : 0.0500 1/yr
NMOC : 4000.00 ppmv
Methane : 50.0000 % volume
Carbon Dioxide : 50.0000 % volume

Landfill Parameters

Landfill type : No Co-Disposal
Year Opened : 1972 Current Year : 1997 Closure Year:
Capacity : 4645000 Mg
Average Acceptance Rate Required from
Current Year to Closure Year : 263660.78 Mg/year

Model Results

Year	Refuse In Place (Mg)	NMOC Emission Rate (Mg/yr)	(Cubic m/yr)
1973	9.965E+04	2.429E+01	6.776E+03
1974	1.993E+05	4.739E+01	1.322E+04
1975	2.990E+05	6.937E+01	1.935E+04
1976	3.986E+05	9.028E+01	2.519E+04
1977	4.983E+05	1.102E+02	3.073E+04
1978	5.979E+05	1.291E+02	3.601E+04
1979	6.976E+05	1.471E+02	4.103E+04
1980	7.972E+05	1.642E+02	4.581E+04
1981	8.969E+05	1.805E+02	5.035E+04
1982	9.965E+05	1.960E+02	5.467E+04
1983	1.096E+06	2.107E+02	5.878E+04
1984	1.196E+06	2.247E+02	6.269E+04
1985	1.295E+06	2.380E+02	6.641E+04
1986	1.395E+06	2.507E+02	6.994E+04
1987	1.495E+06	2.628E+02	7.331E+04
1988	1.594E+06	2.742E+02	7.651E+04
1989	1.694E+06	2.852E+02	7.956E+04
1990	1.794E+06	2.955E+02	8.245E+04
1991	1.893E+06	3.054E+02	8.521E+04
1992	1.993E+06	3.148E+02	8.783E+04
1993	2.093E+06	3.237E+02	9.032E+04
1994	2.192E+06	3.322E+02	9.269E+04
1995	2.292E+06	3.403E+02	9.495E+04
1996	2.535E+06	3.830E+02	1.069E+05
1997	2.799E+06	4.287E+02	1.196E+05



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276

Mary A. Gade, Director

217/782-5811
TDD 217/782-9143

December 9, 1998

Gary L. Marzorati, Executive V. P.
Winnebago Reclamation Service
4920 Forest Hill Road
Loves Park, IL 61111

CERTIFIED MAIL # P 344 300 703
RETURN RECEIPT REQUESTED

RE: Non-Compliance Advisory
Facility I.D. 201801AAF
Winnebago Reclamation Service, Winnebago Reclamation Landfill
Facility Location: 8403 Lindenwood Road, Rockford, IL 61109

Dear Mr. Marzorati:

The purpose of this Non-Compliance Advisory is to notify Winnebago Reclamation Service of violations of the Illinois Environmental Protection Act ("Act") and regulations adopted thereunder discovered at Winnebago Reclamation Landfill. The violations, listed in Attachment A, were identified during a record review.

Please respond in writing within 30 days of receipt of this Non-Compliance Advisory and address your response to KANCHAN PATEL, Illinois EPA, Bureau of Air, Compliance Unit, P.O. Box 19276, Springfield, IL 62794-9276. The response should indicate how Winnebago Reclamation Service plans to correct each violation.

This Non-Compliance Advisory is not a Violation Notice as specified in Section 31(a)(1) of the Act, 415 ILCS 5/31(a)(1). However, if you do not adequately respond to this Non-Compliance Advisory, the Illinois EPA may issue a formal Violation Notice pursuant to Section 31(a)(1) of the Act.

If you have any questions regarding any of the above, please contact KANCHAN PATEL at 217/782-5811.

Sincerely,

A handwritten signature in dark ink, appearing to read "David J. Kolaz".

David J. Kolaz, Manager
Compliance and Systems Management Section
Bureau of Air

DK: KP

cc: FOS Peoria Regional Office
Permits Section

Non-Compliance Advisory
Facility I.D. 201801AAF
Winnebago Reclamation Service, Winnebago Reclamation Landfill

ATTACHMENT A

VIOLATIONS:

Based on a review of Illinois EPA records:

1. Section 9.1(d) of the Act and 40 CFR 60.752(c) of Subpart WWW - Standard of Performance for Municipal Solid Waste Landfills: Winnebago Reclamation Service is an owner or operator of Winnebago Reclamation Landfill and has commenced construction, reconstruction or modification on or after May 30, 1991, and therefore is subject to the Federal regulations, Subpart WWW. Further, based on the initial design capacity report received from Winnebago Reclamation Service on June 12, 1996, the source is a major source and was required to file a Clean Air Act Permit Program (CAAPP) permit application before March 12, 1997. Winnebago Reclamation Service failed to file an application to obtain a CAAPP permit on or before March 12, 1997, and has yet to file such application.
2. 40 CFR 60.757(b) of Subpart WWW - Standard of Performance for Municipal Solid Waste Landfills: Winnebago Reclamation Service failed to submit the annual Non-Methane Organic Carbon (NMOC) emission rate report (Tier 1) on or before June 10, 1996, and annually thereafter, as required.

RECOMMENDATIONS:

The Illinois EPA suggests that Winnebago Reclamation Service take the following actions to resolve the violations listed above:

1. Within 30 days of receipt of this Non-Compliance Advisory, complete the enclosed CAAPP permit application and submit it to Illinois EPA, Bureau of Air, Permit Section, P.O. Box 19506, Springfield, IL 62794-9506. If you need assistance in completing the permit application, contact Michael Davidson at 217/782-2113.
2. Within 30 days of receipt of this Non-Compliance Advisory, submit a Tier 1 NMOC emission rate report. If the Tier 1 NMOC emission rate equals or exceeds 50 Mg/year, the owner or operator may elect to recalculate the NMOC emission rate (Tier 2) after Tier 2 NMOC sampling and analysis. If the Tier 2 NMOC emission rate equals or exceeds 50 Mg/year, the owner or operator may elect to recalculate the NMOC emission rate (Tier 3) after determining a site-specific methane generation constant (k). The owner or operator is required to install a gas collection and control system when the NMOC emission rate equals or exceeds 50 Mg/year. If and when the NMOC emissions rate exceeds 50 Mg/year, submit a gas collection and control design plan and a construction permit application for gas collection and control system as required per Subpart WWW. If the gas collection and control system has already been installed, the owner or operator shall obtain an operating permit as required per Subpart WWW for the gas collection and control system.



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

P. O. Box 19506, Springfield, IL 62794-9506

217/782-2113

July 24, 1998

I.D. Number 201808ADB

ENVIRONMENTAL COORDINATOR
NRG TECHNOLOGY INC
8403 LINDENWOOD RD
ROCKFORD, IL 61109

Re: Extension of January 25, 1995 Transition Policy

This letter is to notify your Source that on July 10, 1998 the USEPA extended the January 25, 1995 potential to emit (PTE) transition policy deadline from July 31, 1998 to December 31, 1999 (copy enclosed).

Therefore, the Illinois EPA's previous acceptance of your request for registration as a 'Non-Major Source Based Upon Actual Emission Levels' is still valid and is extended to December 31, 1999. Pursuant to this extension, you must establish enforceable limitations for this Source by December 31, 1999, in a Federally Enforceable State Operating Permit (FESOP) to maintain non-major source status. If enforceable limitations have not been established by that date, a CAAPP permit will be required.

As you are aware your Source is required to maintain adequate records demonstrating that your actual emissions are 50% or less of applicable major source thresholds. In order to maintain your non-major source status, emissions must remain below this level until enforceable limitations are established.

If you have any questions, please call the Permit Section at 217/782-2113.

Sincerely,

A handwritten signature in cursive script that reads "Donald E. Sutton".

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:BEA:trans99

cc: Regional Office
I.D. File
Dave Kolaz - CASM

Enclosure (1)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 10, 1998

MEMORANDUM

SUBJECT: Second Extension of January 25, 1995 Potential to Emit
Transition Policy and Clarification of Interim Policy

FROM: John S. Scitz, Director *John Scitz*
Office of Air Quality Planning and Standards (MD-10)

Eric V. Schaeffer, Director *Eric Schaeffer*
Office of Regulatory Enforcement (2241A)

TO: See Addressees

This memorandum further extends the Environmental Protection Agency's (EPA) January 25, 1995 transition policy for potential to emit (PTE) limits relative to maximum achievable control technology (MACT) standards issued under section 112 of the Clean Air Act and federal operating permits issued under Title V programs. It also clarifies how the EPA's interim policy on PTE, first discussed in a January 22, 1996 memorandum, works with the transition policy.

Background

Many Clean Air Act requirements apply only to "major" sources, that is, those sources whose actual or potential emissions of air pollution exceed threshold emissions levels specified in the Act. A source's total potential to emit is determined by a two step process. First, the source's potential emissions at maximum physical capacity are established. This figure is then reduced by any recognized, practically enforceable limits on the source's emissions, such as limits on rates of production, hours of operation, and type and amount of fuel burned or materials processed. The three primary programs where PTE is a significant factor are (1) the section 112 MACT program to control emissions of hazardous air pollutants (HAPs); (2) the Title V operating permits program; and (3) the New Source Review (NSR) programs in Part C of Title I (the prevention of significant deterioration (PSD) program) and Part D of Title I (the nonattainment NSR program). These programs each contain a definition of PTE. Due to several court decisions addressing the requirement in EPA's regulatory definition of PTE under these programs that any enforceable limits on potential emissions be federally enforceable, these regulations are currently under review, and the EPA is engaged in a rulemaking process to consider amendments to the current requirements. The EPA has reviewed information provided



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Interim Policy During Period Between D.C. Circuit Opinions and Final PTE Rule

A January 22, 1996 policy memorandum entitled "Release of Interim Policy on Federal Enforceability of Limitations on Potential to Emit" sets forth the EPA's interim policy on federal enforceability during the period prior to the effective date of a final PTE rule (available on the Internet at <http://www.epa.gov/ttn/oarpg/t5pgm.html>). Because there have been several inquiries into the application of the interim policy, the EPA encourages Regions, States and regulated sources to review that policy memorandum, as it still represents the EPA's position. A brief description is provided below.

Section 112: In National Mining Association v. EPA, 59 F.3d 1362 (D.C. Cir. 1995), the D.C. Circuit questioned whether the federal enforceability requirement in the General Provisions to 40 C.F.R. part 63 was "necessary." The court remanded, but did not vacate, the definition of PTE in the General Provisions. Nonetheless, as noted above, since January 25, 1995, in a policy decision prior to the National Mining opinion, the EPA has followed the transition policy regarding what limits are necessary to render a source of hazardous air pollutants a "synthetic minor" source for purposes of section 112. As discussed above, today's memorandum extends the transition policy until December 31, 1999.

Title V: In Clean Air Implementation Project v. EPA, No. 96-1224 (D.C. Cir. June 28, 1996) (CAIP), the court vacated and remanded the requirement for federal enforceability for PTE limits under 40 C.F.R. part 70. The EPA has stated that the term "federally enforceable" in section 70.2 should now be read to mean "federally enforceable or legally and practicably enforceable by a State or local air pollution control agency" pending any additional rulemaking by the EPA.

As stated in the August 1996 memorandum, the EPA interprets the court order vacating the part 70 definition as not affecting any requirement for federal enforceability in existing State rules and programs. Pending the outcome of the current rulemaking effort, the EPA believes that States are not likely to pursue submittals for program revisions. Thus, despite the State program requirements for federal enforceability, there may be States wishing to continue to observe the transition policy -- the transition policy specifically allows States to follow it in determining Title V applicability. Therefore, as stated above, the EPA is extending the transition policy as it relates to Title V permitting until December 31, 1999.

New Source Review: In Chemical Manufacturers Association v. EPA, No. 89-1514 (D.C. Cir. Sept. 15, 1995) the court remanded and vacated the federal enforceability requirement in the federal NSR/PSD rules. The EPA reiterates that neither the January 25, 1995 transition policy, the opinion in National Mining nor the court order in CAIP impacts the NSR or PSD programs. A full discussion of the EPA's policy with respect to PTE issues related to the NSR and PSD programs is presented in the January 22, 1996 policy memorandum.

In brief, that memorandum states that the court's order in Chemical Manufacturers Association did not impact the individual state rules implementing these programs that have been incorporated into EPA-approved State Implementation Plans (SIPs). Thus, the order's practical

impacts on NSR/PSD programs are not substantial for new construction -- federal enforceability is still required to create "synthetic minor" new and modified sources in most circumstances pending completion of the PTE rulemaking. The precise impact of the vacatur on NSR/PSD applicability can be definitively determined only by reviewing the applicable SIP provisions.

Distribution/Further Information

We are asking Regional Offices to send this memorandum to States within their jurisdiction. Questions concerning specific issues and cases should be directed to the appropriate Regional Office. The Regional Office staff may contact John Walke of the Office of General Counsel at 202-260-9856; or Carol Holmes of the Office of Regulatory Enforcement at 202-564-8709. The document is also available on the Internet, at <http://www.epa.gov/ttn/oarpg>, under "OAR Policy and Guidance Information."

Addressees:

Director, Office of Ecosystem Protection, Region I
Director, Division of Environmental Planning and Protection,
Region II
Director, Division of Air Quality, Region III
Director, Air, Pesticides, and Toxics Management Division, Region IV
Director, Air and Radiation Division, Region V
Director, Multimedia Planning and Permitting Division, Region VI
Director, Air, RCRA, and TSCA Division, Region VII
Assistant Regional Administrator, Office of Pollution Prevention,
State, and Tribal Assistance, Region VIII
Director, Air and Toxics Division, Region IX
Director, Office of Air, Region X
Regional Counsels, Regions I-X
Director, Office of Environmental Stewardship, Region I
Director, Division of Enforcement and Compliance Assurance,
Region II
Director, Enforcement Coordination Office, Region III
Director, Compliance Assurance and Enforcement Division, Region VI
Director, Enforcement Coordination Office, Region VII
Assistant Regional Administrator, Office of Enforcement, Compliance
and Environmental Justice, Region VIII
Enforcement Coordinator, Office of Regional Enforcement
Coordination, Region IX

cc: C. Holmes (2242A)
J. Ketcham-Colwill (6103)
J. Walke (2344)
L. Hutchinson (MD12)



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

P. O. Box 19506, Springfield, IL 62794-9506

217/782-2113

OPERATING PERMIT

PERMITTEE

Winnebago Reclamation Service, Inc.
Attn: Gary L. Marzorati
4920 Forest Hills Road
Loves Park, IL 61111

Application No.: 94070003

I.D. No.: 201801AAF

Applicant's Designation: FLARE-WRS

Date Received: January 14, 1997

Subject: Flare Station

Date Issued: February 4, 1997

Operating Permit Expiration

Date: February 4, 2002

Location: 8403 Lindenwood Road, Rockford

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a flare station for combustion of landfill gas as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. The flare station shall be operated and maintained for effective combustion of landfill gas. Flame monitor(s) shall be installed, operated and maintained on the flare system to confirm the presence of a flame when landfill gas is being fed.
2. The landfill gas consumption of the flare station in million cubic feet (mcf) shall not exceed 1.44 mcf/day and 525.6 mcf/year.
- 3a. Emissions of nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂) and volatile organic material (VOM) and operation of the flare station shall not exceed the following limits:

Emission Source	Gas Flow Rate (scfm)	E M I S S I O N S								VOM	
		NO _x	CO	SO ₂	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
Flare Station	1000	2.7	11.83	19.0	83.22	0.8	3.5	1.1	4.82		

The NO_x, CO and SO₂ emission limits are based on the maximum gas flow rate allowed and using standard emission factors. The VOM emission limits are based on the maximum concentration of VOM in the landfill gas of 4,000 PPMV measured as hexane at a maximum flow rate of 1,000 scfm and the flare achieving a destruction efficiency of 98%.

- b. This permit is issued based on negligible emissions of particulate matter from the flare station. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- c. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. The Permittee shall install, maintain and operate a continuous monitoring system to monitor and record the fuel consumption for the flare station.
- 5a. The Permittee shall sample and analyze the landfill gas entering the flare station at least once every six months for net heating value, methane, sulfur compounds and non methane organic materials. A report of the analysis result must be submitted to the Agency within 30 days of the sampling.
- b. The Agency will revise this requirement to allow for annual analysis of the landfill gas upon written request from the Permittee, if the Permittee can demonstrate that the measured values remain relatively constant based on the gas analysis data of at least two years.
- 6a. The Permittee shall keep the following records:
 - i. The landfill gas consumption by the flare station, on a daily basis.
 - ii. Record of flare station inspection/maintenance completed log, and operating condition of the flare station. This log should at least include the following:
 - A. Date of inspection.
 - B. Date maintenance performed and completed.
 - C. Type of maintenance needed.
- b. The Permittee shall keep records of the sampling and analysis of landfill gas required by Condition 5.
7. All records required by this permit shall be retained at a readily accessible location at the plant for at least 3 years from the date of entry and shall be made available for inspection and copying by the Agency upon request.
8. Upon exceedance of the requirements of this permit determined by the records required by this permit or any violation of the requirements of this permit, the Permittee shall submit a report to the Agency within 30 days after the exceedance. The report shall include the hourly emissions occurring during the times of exceedance, a copy of the relevant records and a description of the exceedance or violation and efforts to reduce emissions and future occurrences. This report should be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
1340 North Ninth Street
P.O. Box 19276
Springfield, Illinois 62794-9276

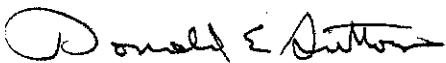
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9. With the Annual Emission report required to be submitted to the Agency pursuant to 35 Ill. Adm. Code Part 254, the Permittee shall report the annual emissions of nitrogen oxides, volatile organic material, carbon monoxide, and sulfur dioxide with supporting calculations and a description of any exceedance of applicable limitations of this permit, if not previously reported.

It should be noted that this permit has been revised to include operation of the equipment described in construction permit 97010035.

It should also be noted that the issuance of this permit supersedes all other permit(s) issued under this application number.

If you have any questions on this, please call Rizwan Syed at 217/782-2113.



Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:RS:jar

cc: Region 2



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

**STANDARD CONDITIONS
FOR
OPERATING PERMITS**

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special permit condition(s).

1. The issuance of this permit does not release the permittee from compliance with state and federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or with applicable local laws, ordinances and regulations.
2. The Agency has issued this permit based upon the information submitted by the permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under 35 Ill. Adm. Code 201.207.
3.
 - a. The permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Agency and unless a new permit or revision of the existing permit(s) is issued for such modification.
 - b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.
4. The permittee shall allow any duly authorized agent of the Agency, upon the presentation of credentials, at reasonable times:
 - a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,
 - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. to obtain and remove samples of any discharge or emission of pollutants, and
 - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located,
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the facilities,



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

P. O. Box 19506, Springfield, IL 62794-9506

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Winnebago Reclamation Service, Inc.
Attn: Gary L. Marzorati
4920 Forest Hills Road
Loves Park, Illinois 61111

Application No.: 97010035

I.D. No.: 201801AAF

Applicant's Designation: FLARE-WRS

Date Received: January 14, 1997

Subject: Flare Station

Date Issued: February 4, 1997

Location: 8403 Lindenwood Road, Rockford

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a flare station for combustion of landfill gas as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. The flare station shall be operated and maintained for effective combustion of landfill gas. Flame monitor(s) shall be installed, operated and maintained on the flare system to confirm the presence of a flame when landfill gas is being fed.
2. The landfill gas consumption of the flare station in million cubic feet (mcf) shall not exceed 1.44 mcf/day and 525.6 mcf/year.
- 3a. Emissions of nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂) and volatile organic material (VOM) and operation of the flare station shall not exceed the following limits:

Emission Source	Gas Flow	E M I S S I O N S							
	Rate (scfm)	NO _x lb/hr	ton/yr	CO lb/hr	ton/yr	SO ₂ lb/hr	ton/yr	VOM lb/hr	ton/yr
Flare Station	1000	2.7	11.83	19.0	83.22	0.8	3.5	1.1	4.82

The NO_x, CO and SO₂ emission limits are based on the maximum gas flow rate allowed and using standard emission factors. The VOM emission limits are based on the maximum concentration of VOM in the landfill gas of 4,000 PPMV measured as hexane at a maximum flow rate of 1,000 scfm and the flare achieving a destruction efficiency of 98%.

- b. This permit is issued based on negligible emissions of particulate matter from the flare station. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- c. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. The Permittee shall install, maintain and operate a continuous monitoring system to monitor and record the fuel consumption for the flare station.
- 5a. The Permittee shall sample and analyze the landfill gas entering the flare station at least once every six months for net heating value, methane, sulfur compounds and non methane organic materials. A report of the analysis result must be submitted to the Agency within 30 days of the sampling.
- b. The Agency will revise this requirement to allow for annual analysis of the landfill gas upon written request from the Permittee, if the Permittee can demonstrate that the measured values remain relatively constant based on the gas analysis data of at least two years.
- 6a. The Permittee shall keep the following records:
 - i. The landfill gas consumption by the flare station, on a daily basis.
 - ii. Record of flare station inspection/maintenance completed log, and operating condition of the flare station. This log should at least include the following:
 - A. Date of inspection.
 - B. Date maintenance performed and completed.
 - C. Type of maintenance needed.
- b. The Permittee shall keep records of the sampling and analysis of landfill gas required by Condition 5.
7. All records required by this permit shall be retained at a readily accessible location at the plant for at least 3 years from the date of entry and shall be made available for inspection and copying by the Agency upon request.
8. Upon exceedance of the requirements of this permit determined by the records required by this permit or any violation of the requirements of this permit, the Permittee shall submit a report to the Agency within 30 days after the exceedance. The report shall include the hourly emissions occurring during the times of exceedance, a copy of the relevant records and a description of the exceedance or violation and efforts to reduce emissions and future occurrences. This report should be sent to:

Illinois Environmental Protection Agency
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1340 North Ninth Street
P.O. Box 19276
Springfield, Illinois 62794-9276

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9. With the Annual Emission report required to be submitted to the Agency pursuant to 35 Ill. Adm. Code Part 254, the Permittee shall report the annual emissions of nitrogen oxides, volatile organic material, carbon monoxide, and sulfur dioxide with supporting calculations and a description of any exceedance of applicable limitations of this permit, if not previously reported.

Please note that the operation of the equipment described in this construction permit has been incorporated in operating permit 94070003.

If you have any questions on this, please call Rizwan Syed at 217/782-2113.

DES

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:RS:jar

cc: Region 2



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

**STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:
 - a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,
 - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. to obtain and remove samples of any discharge or emissions of pollutants, and
 - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities,
 - c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

- e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
- 6.
- a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.
 - b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
- a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or
 - b. upon finding that any standard or special conditions have been violated, or
 - c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.